

# **Grow Therapy** **Privacy Notice**

***Last updated March 25, 2024***

Welcome! We are Grow Therapy, an online platform dedicated to getting more people into therapy by bridging the gap between therapists and people seeking mental health care. This Privacy Policy explains how Grow Care, Inc. (“**Grow Therapy**”, “**Company**”, “**we**”, “**us**” or “**our**”) collects, uses, discloses, and otherwise processes personal information (as defined below) in connection with our websites (the “**Sites**”) and other websites we own and operate that link to this Privacy Policy, and the related content, platform, services, products, apps, and other functionality offered on or through our services (collectively, the “**Services**”). It does not address our privacy practices relating to Grow Therapy employees and other personnel.

In certain situations, Grow Therapy may function as a service provider for an associated but independent group of affiliated clinical practices (the “**Grow Professionals**”). In the course of providing services for the Grow Professionals, we may collect your personal information on behalf of the Grow Professionals. We refer to this type of personal information as “**Customer Data**.” We collect and process Customer Data on behalf of the Grow Professionals subject to restrictions set forth in our contracts with them, including HIPAA business associate agreements. This Privacy Policy does not apply to our collection and processing of Customer Data. We recommend referring to the Grow Professionals’ [Notice of Privacy Practices](#) for information on how they engage service providers, like us, to collect and process Customer Data on their behalf.

## **I. WHAT IS PERSONAL INFORMATION?**

When we use the term “**personal information**” in this Privacy Policy, we mean any data or information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular natural person or household or any other data or information that constitutes “personal data”, “personal information,” or “personally identifiable information.”

## **II. OUR COLLECTION AND USE OF PERSONAL INFORMATION**

We collect personal information in a variety of ways. For example, you may provide us your personal information when you send us messages, subscribe to our mailing lists, newsletters or other forms of marketing communications, participate in a survey, or use some other feature of our Service.

We may link or combine your activities and information collected from you on our websites and mobile apps with information we receive from third parties, as well as information we collect automatically through tracking technologies (defined below). This allows us to provide you with a personalized experience regardless of how you interact with us.

### **Personal Information Collected from You**

We may collect the following categories personal information submitted to us by individuals through the Services:

- **Network Application Information.** If you apply to join the Grow Therapy network as a Grow Professional, we may collect your first and last name, phone number, state of licensure, license type, referral information, current practice setting, and information regarding how you learned about Grow Therapy. We use this information to fulfill your request, to communicate with you directly, and to determine whether you are eligible to join the network.
- **Inquiry and Communications Information,** including information provided in custom messages sent through the forms, in chat messages, to one of our email addresses, or via phone. This also includes contact information provided on our Services. We use this information to investigate and respond to your inquiries, and to communicate with you, to enhance the services we offer to our users and to manage and grow our organization.
- **Login Information.** In addition to information you provide upon sign-up, such as your email address, we collect your login credentials, including your username and password, when you create an account with us. If you choose to create an account using a third-party service, such as Google, we collect information from the third party. For more information about this, and information we collect when we use other third-party services to provide certain features, please see Personal Information from Third Parties, below.

- **Internet and Other Electronic Network Information**, including IP address, online identifiers, and device identifiers. For more details about this type of information collection, please see “Third-Party Integrations” in How We Use Cookies and Other Tracking Technologies To Collect Information, below.
- **Newsletter and Marketing Emails**, including email address and applicable interests and communication preferences. We use this information to manage our communications with you and send you information about products and services we think may be of interest to you. If you wish to stop receiving email messages from us, simply click the “unsubscribe link” provided at the bottom of the email communication. Note that you cannot unsubscribe from certain services-related email communications (e.g., account verification, confirmations of transactions, technical or legal notices).
- **Survey and Testimonial Information**, including information included in any questions submitted through surveys or content of any testimonials. We use this information to administer and facilitate the Services, to respond to your submission, to communicate with you, to conduct market research, inform our marketing and advertising activities and improve and grow our business.
- **Events and Promotions**. If you fill out any forms or participate in Grow Therapy events or promotional events, we may collect your contact information (such as your name, email, and phone number, postal code) and any other information requested as part of the event or promotion entry, including photos/videos (each, as applicable). If you are part of our event or promotion partner, we may also collect your personal information including your name, company email, and company address.
- **Feedback Information**. We may also collect feedback and ratings you provide relating to our services or products. We use this information to communicate with you, to conduct market research, inform our marketing and advertising activities and improve and grow our business.
- **Provider or Employment Application Information**, including your contact and demographic information, educational and work history, credentialing information, professional history and expertise, employment interests, information obtained during interviews and any other information you choose to provide, if you apply for a position with us or seek to join our network as a Grow Professional. For more information about our information practices in this context, please see “Additional Information for Job or Provider Applicants” below.

### **Personal Information from Third Parties**

We also obtain personal information from third parties; which we often combine with personal information we collect either automatically or directly from an individual.

We may receive the same categories of personal information as described above from the following third parties:

- **Grow Therapy Entities**: We may receive personal information from other companies and brands owned or controlled by Grow Therapy, and other companies owned by or under common ownership as Grow Therapy.
- **Other Users or Individuals who Interact with our Services**: We may receive your information from other users or other individuals who interact with our Services. For example, if you engage in one of our communications hosted on third-party platforms, we will be able to see any public communications made within that platform.
- **Third-Party Integrations**: Our Services integrate with third parties to offer certain functionalities. This includes logging into the Services through a third-party service like Google or providing scheduling functionality through a third-party calendar feature. When you use third-party sign-on services, we receive your email address, name, and identifiers associated with that third-party service. When you use a third-party scheduling feature, we collect your email address associated with your calendar account and the start and end times of events on your calendar to determine availability. We choose what information we collect from the third party, and we do not collect other details about your calendar events, such as invitees or event names. After we facilitate scheduling an event for the Services, we collect the online identifier associated with that event so that we may help modify it in case you or a Grow Professional needs to reschedule or cancel. Please note that our use of these third-party integrations may be subject to their terms and privacy policies. For more information about the Google API Services User Data Policy that we must comply with, including the Limited Use requirements, please visit:

<https://developers.google.com/terms/api-services-user-data-policy>. We recommend that you review and, if necessary, adjust your privacy settings on third-party websites and services before sharing information and/or linking or connecting them to other platforms, including our Services.

- **Social Media:** When an individual interacts with our Services through various social media networks, such as when someone “Likes” us on Facebook or follows us or shares our content on Facebook, LinkedIn, Twitter, or other social networks, we may receive some information about individuals that they permit the social network to share with third parties. The data we receive is dependent upon an individual’s privacy settings with the social network. Individuals should always review and, if necessary, adjust their privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.
- **Service Providers:** Our service providers that perform services solely on our behalf, such as survey and marketing providers and payment processors, collect personal information and often share some or all of this information with us. The information may include contact information, demographic information, payment information, information about your communications and related activities, and information about your orders. We may use this information to administer and facilitate our services, your orders, and our marketing activities.
- **Business Partners:** We may receive your information from our business partners, such as companies that offer their products and/or services on our Services. We may use this information to administer and facilitate our services, your orders, and our marketing activities.
- **Other Sources:** We may also collect Personal Information about individuals that we do not otherwise have from, for example, publicly available sources, third-party data providers, brand partnerships, or through transactions such as mergers and acquisitions. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.

### **Uses of Personal Information**

In addition to the information provided above, we may use personal information we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to deliver the Services you have requested;
- Verify your identity and entitlement to Services when you contact us or access our Services;
- Register you for and provide you access to events and webcasts;
- Communicate with individuals, including via email, social media, and phone calls;
- Request individuals to complete surveys about our organization, organizations we partner with, and Services;
- For marketing and advertising purposes, including to market to you or offer you through email, direct mail, phone or text message information and updates on products or services we think that you may be interested in;
- Administer, improve, and personalize our Services, including by recognizing an individual and remembering their information when they return to our Services;
- Process payment for our Services;
- Facilitate customer support services;

- Identify and analyze how individuals use our Services;
- Improve and customize our Services to address the needs and interests of our user base and other individuals we interact with;
- Test, enhance, update, and monitor the Services, or diagnose or fix technology problems;
- Help maintain the safety, security, and integrity of our property and Services, technology assets and business;
- To enforce our [Terms of Service](#), to resolve disputes, to carry out our obligations, and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Prevent, investigate, or provide notice of fraud or unlawful or criminal activity;
- Comply with contractual and legal obligations and requirements;
- To fulfill any other purpose for which you provide personal information; and
- For any other lawful purpose, or other purpose that you consent to.

Where you choose to contact us, we may need additional information to fulfill the request or respond to inquiries. We may provide you with additional privacy-related information where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Privacy Policy. In that case, the additional Privacy Policy will govern how we may process the information provided at that time.

### III. HOW WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES TO COLLECT INFORMATION

We, and our third-party providers, automatically collect information you provide to us and information about how you access and use the Services when you visit our services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies, and logging technologies (collectively, "**tracking technologies**") and we may use third-party providers or technologies to collect this information. Information we collect automatically about you may be combined with other personal information we collect directly from you or receive from other sources.

We, and our third-party providers, use tracking technologies to automatically collect usage and device information, such as:

- **Information the computer, tablet, smartphone, or other device you use**, such as your IP address, browser type, Internet service provider, device type/model/manufacture, operating system, date and time stamp, and a unique ID that allows us to uniquely identify your browser, mobile device, or your account (including, for example, a persistent device identifier or an Ad ID), and other such information. We may also work with third-party providers to employ technologies, including the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices.
- **Information about the way you access and use our Services**, for example, the site from which you came and the site to which you are going when you leave our Services, how frequently you access the Services, whether you open emails or click the links contained in emails, whether you access the Services from multiple devices, and other browsing behavior and actions you take on the Services.
- **Information about how you use the Service**, such as the pages you visit, the links you click, the ads you view and click on, videos you watch, and other similar actions. We may also use third-party tools to collect information you provide to us or information about how you use the Services and may record your mouse movements, scrolling, clicks, and keystroke activity on the Services and other browsing, search, or purchasing behavior. These tools may also record information you enter when you interact with our Services or engage in chat features through our Services.

- **Information about your location**, such as general geographic location that we or our third-party providers may derive from your IP address.
- **Analytics information.** We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure traffic and usage trends for the services and to understand more about the demographics of our users. You can learn more about Google's practices at <https://policies.google.com/technologies/partner-sites> and view its opt-out options at <https://tools.google.com/dlpage/gaoptout/>.

All of the information collected automatically through these tools allows us to improve your customer experience. For example, we may use this information to enhance and personalize your user experience, to monitor and improve our Sites and Services, and to improve the effectiveness of our Services, offers, advertising, communications, and customer service. We may also use this information the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our Services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our Services.

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 to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies; however, doing so may negatively impact your experience using the Services, as some features may not work properly. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

We and our third-party providers may also use cookies and tracking technologies for advertising purposes. For more information about tracking technologies, please see [Third-Party Data Collection and Online Advertising](#) below.

#### IV. OUR DISCLOSURE OF PERSONAL INFORMATION

We may also share, transmit, disclose, grant access to, make available, and provide personal information with and to third parties, as follows:

- **Grow Therapy Entities:** We may share personal information with other companies owned or controlled by Grow Therapy, and other companies owned by or under common ownership as Grow Therapy, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns, particularly when we collaborate in providing the Services.
- **Marketing Providers:** We coordinate and share personal information with our marketing providers to communicate with individuals about the Services we make available.
- **Customer Service and Communication Providers:** We share personal information with third parties who assist us in providing our customer services and facilitating our communications with individuals that submit inquiries.
- **Third-Party Providers:** In addition to the third parties identified above, we engage other third-party service providers that perform business or operational services for us or on our behalf, such as website hosting, infrastructure provisioning, IT services, analytics services, employment application-related services, payment processing services, and administrative services. This also includes third parties that help us provide certain features on the Services, like third-party sign-in or scheduling features.
- **Survey Providers:** We share personal information with third parties who assist us in delivering our survey offerings and processing the responses.
- **Ad Networks and Advertising Providers:** We work with third-party ad networks and advertising providers to deliver advertising and personalized content on our Services, on other websites and services, and across other devices. These parties may collect information directly from a browser or device when an individual visits our Services through cookies or other data collection technologies. This information is

used to provide and inform targeted advertising, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research. For more information, please see the [Third-Party Data Collection and Online Advertising](#) section.

- **Business Partners:** From time to time, we may share personal information with our business partners, or we may allow our business partners to collect your personal information. Our business partners may use your information for their own business and commercial purposes, including to send you any information about their products or services that may be of interest to you.
- **Business Transaction or Reorganization:** We may evaluate, take part in, or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with, or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- **Legal Obligations and Rights:** We may disclose personal information to third parties, such as legal advisors and law enforcement:
  - o in connection with the establishment, exercise, or defense of legal claims;
  - o to comply with laws or to respond to lawful requests and legal process;
  - o to protect our rights and property and the rights and property of others, including to enforce our agreements and policies;
  - o to detect, suppress, or prevent fraud;
  - o to protect the health and safety of us and others; or
  - o as otherwise required by applicable law.
- **With Your Consent:** We may disclose personal information about an individual to certain other third parties or publicly with their consent or direction. For example, with an individual's consent or direction we may post their testimonial on our Sites or service-related publications.

## V. THIRD-PARTY DATA COLLECTION AND ONLINE ADVERTISING

We may participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your browsing history. We may permit third-party online advertising networks, social media companies, and other third-party services, to collect information about your use of our online services over time so that they may play or display ads on our Services, on other websites or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through tracking technologies, such as cookies, web beacons, embedded scripts, location-identifying technologies, and similar technology, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the Sites, AdID, geolocation, and other information. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising providers to help identify you across devices. We and our third-party providers use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research. We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms. We may do this by providing a hashed version of your email address or other information to the platform provider.

We may engage in the following:

- **Social Media Platforms.** We may display targeted advertising to you through social media platforms, such as Twitter, Instagram, LinkedIn, and other social media forums. These companies have interest-based advertising programs that allow us to direct advertisements to users who have shown interest in our services while those users are on the social media platform, or to groups of other users who share similar traits, such as likely commercial interests and demographics. We may share a unique identifier, such as a user ID, with these platform providers or they may collect information from our website visitors through a first-party pixel, in order to direct targeted advertising to you or to a custom audience on the social media platform. These advertisements are governed by the privacy policies of those social media companies that provide them. If you do not want to receive targeted ads on your social

networks, you may be able to adjust your advertising preferences through your settings on those networks.

- **Third-Party Providers.** We work with a variety of third-party providers to provide advertising services. For example, we use Google Analytics to recognize you and link the devices you use when you visit our Services on your browser or mobile device, log in to your account on our Services, or otherwise engage with us. We share a unique identifier, like a user ID, with Google to facilitate the service. Google Analytics allows us to better understand how our users interact with our Services and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's website, "How Google uses data when you use our partners' sites or apps" located at <https://policies.google.com/technologies/partner-sites>. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Ad-On here: <https://tools.google.com/dlpage/gaoptout/>.
- We may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to the Services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>.

Our Services do not currently respond to Do Not Track ("DNT") signals. However, our Services may recognize and respond to other opt-out preference signals, like the Global Privacy Control ("GPC") signal. For more information about the GPC signal, including how to download a GPC browser plug-in, please visit their site, at <https://globalprivacycontrol.org/>. To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Digital Advertising Alliance's (DAA) resources and/or the Network Advertising Initiative's (NAI) online resources, at [www.aboutads.info/choices](http://www.aboutads.info/choices) or <http://www.networkadvertising.org/choices>. You may also be able to limit interest-based advertising through the settings menu on your mobile device by selecting "limit ad tracking" (iOS) or "opt-out of interest-based ads" (Android). You may also be able to opt-out of some — but not all — interest-based advertising served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app.

Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on our online services. It means that the online ads that you do see from DAA program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our online services, including for analytics and fraud prevention as well as any other purpose permitted under the DAA's Principles.

## VI. CONTROL OVER YOUR INFORMATION

You may control your information in the following ways:

- **Access to Your Device Information.** You may control the Services' access to your device information through your "Settings" app on your device. For instance, you can withdraw permission for the Services to access your network devices and geolocation and to integrate with your other applications.
- **Email Communications Preferences.** You can stop receiving promotional email communications from us by clicking on the "unsubscribe" link provided in such communications. You may not opt-out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Services, technical and security notices).
- **Push Notifications.** You can stop receiving push notifications from us by changing your preferences in the iOS or Android notifications settings menu.
- **SMS Text Messaging.** You may opt-out of receiving promotional SMS text messages at any time. Please note that unsubscribing from promotional text messages will not prevent you from SMS texts from Grow Therapy directly relating to your use of the Services, such as for account login (e.g., we may send you a security verification code). To unsubscribe from promotional SMS texts, you can reply STOP to any one of our promotional text messages. For more information, see our [Terms of Service](#).
- **Modifying or Deleting Your Information.** If you have any questions about reviewing, modifying, or deleting your information, you can contact us directly at [support@growththerapy.com](mailto:support@growththerapy.com). We may not be able to modify or delete your information in all circumstances.

## **VII. DATA RETENTION**

We store the personal information we collect about you for no longer than necessary to fulfil the purposes for which it was collected, and in accordance with our legitimate business interests and applicable law. We may retain personal information for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so in accordance with legal, tax, and accounting requirements set by industry or government authorities.

To determine the appropriate duration of the retention of personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations.

Once retention of the personal information is no longer necessary for the purposes outlined above, we will either delete or deidentify the personal information or, if this is not possible (for example, because personal information has been stored in backup archives), then we will securely store the personal information and isolate it from further processing until deletion or deidentification is possible.

## **VIII. CHILDREN'S PERSONAL INFORMATION**

We do not knowingly allow individuals under the age of 18 to create accounts that allow access to our Site, unless permitted under applicable law. Children under the age of 18 may only use the Site and Services in accordance with the [Grow Professionals Practice Policies](#), and any personal information relating to those children will be health information governed by the Notice of Privacy Practices. If we learn that we have collected the personal information of a child under 18, or equivalent minimum age depending on jurisdiction, outside the above circumstances, we will take steps to delete the information as soon as possible.

### ***Guardians of children under age 18.***

As part of the services, we will collect the personal information of your child. Your consent is required for the collection, use, and disclosure of your child's information and we have collected your information in order to obtain this consent. We will not collect your child's personal information unless you consent. However, if you do not give your consent, your child may not use our services. We will obtain your verifiable parental consent to collect your child's information through a video conference with you or another mechanism that is permissible under applicable law.

The types of personal information we collect directly from a child is:

- any information the child provides to us during an appointment, including health related information, or while logged into the account you created if you provide the child with your credentials (we do not allow children under age 18, or under age 19 in Nebraska, to register directly for an account at this time);
- information about the child's use of the services, including information sent by the mobile device or computer used by the child (e.g., IP address, unique device identifiers, website usage information, etc.) and information sent by the mobile device(s); and location information.

We use and disclose that information:

- to provide the services;
- for the operation and administration of our business, including disclosures to our business clients who purchase our services for their employees and dependents;
- for business analytics purposes (with the requisite consent);
- for our own marketing purposes (with the requisite consent);
- to provide customer support to you;
- for account and network security purposes;
- to maintain legal and regulatory compliance; and
- to enforce compliance with our agreements and policies.

## **IX. LINKS TO THIRD-PARTY WEBSITES OR SERVICES**

Our Services may include links to third-party websites, plug-ins, and applications. Except where we post, link to or expressly adopt or refer to this Privacy Policy, this Privacy Policy does not apply to, and we are not responsible for, any personal information practices of third-party websites and online services or the practices of other third parties. To learn about the personal information practices of third parties, please visit their respective Privacy Policies.

## **X. UPDATES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time. When we make changes to this Privacy Policy, we will change the date at the beginning of this Privacy Policy. If we make material changes to this Privacy Policy, we will notify individuals by email to their registered email address, by prominent posting on our Services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

## **XI. CONTACT US**

If you have any questions or requests in connection with this Privacy Policy or other privacy-related matters, please send an email to [support@growththerapy.com](mailto:support@growththerapy.com).

## **XII. ADDITIONAL U.S. STATE PRIVACY DISCLOSURES**

**For residents of the States of California, Colorado, Connecticut, Nevada, Utah, and Virginia:** These Additional

U.S. State Privacy Disclosures (“**U.S. Disclosures**”) supplement the information contained in our Privacy Policy by providing additional information about our personal data processing practices relating to individual residents of these States. For a detailed description of how we collect, use, disclose, and otherwise process personal data in connection with our services, please visit our Privacy Policy. Unless otherwise expressly stated, all terms defined in our Privacy Policy retain the same meaning in these U.S. Disclosures.

For the purposes of these U.S. Disclosures, personal information does not include publicly available information or deidentified, aggregated, or anonymized information that is maintained in a form that is not capable of being associated with or linked to you. Additionally, these U.S. Disclosures do not describe our practices when we process Customer Data as a service provider on behalf of our clients in accordance with our contractual agreements with our Customers or when we process Customer Data on behalf of Grow Professionals.

### **Your Privacy Choices**

In accordance with applicable privacy law, and depending upon the jurisdiction in which you reside, you may have some or all of the following rights in respect of your personal information:

- **Right of access. You may have the right to obtain:**
  - o confirmation of whether, and where, we are processing your personal information;
  - o information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
  - o information about the categories of recipients with whom we may share your personal information; and
  - o a copy of the personal information we hold about you.
- **Right of portability.** You may have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
- **Right to rectification or correction.** You may have the right to request the rectification or correction of any inaccurate or incomplete personal information we hold about you.
- **Right to deletion or erasure.** You may have the right, in some circumstances, to request that we delete or erase your personal information.
- **Right to restriction.** You may have the right, in some circumstances, to request to limit the purposes for which we process your personal information, for example if we use or disclose certain “sensitive” personal

information for purposes other than those provided by law, or if the accuracy of certain the personal information is contested by you.

- **Right to opt-out.** You may have the right to opt-out of certain processing activities. For example, you may have the right to opt-out of the use of your personal information for targeted advertising purposes, or to opt out of the “selling” or “sharing” of your personal information with third parties in certain contexts.
- **Right to control over automated decision-making/profiling.** You may have the right to request that we not use automated decision-making or profiling for certain purposes.
- **Right to withdraw consent.** If you have provided consent for the processing of your personal information, you may have the right to withdraw your consent. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information before your withdrawal.
- **Right to appeal.** In the event that we decline to take action on a request exercising one of your rights set forth above, you have the right to appeal our decision.
  - o Colorado Residents: If your appeal is denied, you may contact the Colorado Attorney General to address your concerns [here](#).
  - o Connecticut Residents: If your appeal is denied, you may contact the Connecticut Attorney General to submit a complaint [here](#).
  - o Virginia Residents: If your appeal is denied, you may contact the Virginia Attorney General to submit a complaint [here](#).
- **Right to Nondiscrimination.** You have the right not to receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights. However, the exercise of the rights described above may result in a different price, rate or quality level of product or service where that difference is reasonably related to the impact the right has on our relationship or is otherwise permitted by law.

### How to Exercise Your Privacy Rights

To submit a request to exercise one of the privacy rights identified above, you may:

- Click on Cookie Preferences in the footer of [our website](#) under “Legal” where you can adjust your preferences with respect to what data is collected and shared through cookies and related technology; **or**
- Complete our [Individual Rights Request Form](#) for any of the above privacy rights requests; **or**
- Call us at our toll-free number, 786-755-1863, to make any of the above privacy rights requests.

We may need to verify your identity before processing your request, which may require us to request additional personal information from you or require you to log into your account, if you have one. We will only use personal information provided in connection with a Consumer Rights Request to process the request.

In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

### Exercise Your Right to Opt-Out of Personal Information Sales or Sharing for Targeted Advertising

Under California law, a “sale” or “sharing” is broadly defined to include the sharing of personal information in exchange for anything of value. As a result, our use of advertising cookies and web beacons may be considered a “sale” or “sharing” of personal information under California law. The third parties to whom we sell or share personal information may use such information for their own purposes in accordance with their own privacy policies.

You have the ability to opt out of this sharing at any time, as discussed below. You do not need to create an account with us to exercise your right to opt-out. However, we may ask you to provide additional personal information so that we can properly identify you to track compliance with your opt-out request. We will only use personal information provided in an opt-out request to review and comply with the request. If you choose not to provide this information, we may only be able to process your request to the extent we are able to identify you in our data systems.

To exercise the right to opt-out, you may submit a request by following the directions below, or the directions above under “How to Exercise Your Privacy Rights”:

- **Cookies-based Opt-Out (Do Not Sell or Share My Personal Information).** To exercise your right to opt- out as it relates to the use of cookies and other tracking technologies for analytics and targeted ads, please click on Cookie Preferences in the footer of [our website](#) under “Legal”. Please note this opt out is

browser specific. You must reset your preferences if you clear cookies or use a different browser or device.

## CALIFORNIA-SPECIFIC DISCLOSURES

The following disclosures are made in compliance with the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively "CCPA").

### ***Collection and Use of Personal Information***

We collect personal information from and about consumers for a variety of purposes. To learn more about the types of personal information we collect, the sources from which we collect or receive personal information, and the purposes for which we use this information, please refer to the "**Our Collection of Personal Information**" and "**Our Use of Personal Information**" sections of our **Privacy Policy**.

In the last 12 months, we have collected the following categories of personal information:

- **Identifiers**, such as your name and email address. If you are a Grow Professional, we collect copies of your government-issued identification;
- **California Customer Records (Cal. Civ. Code § 1798.80(e))**, such as your phone number;
- **Characteristics of protected classifications under state or federal law**, such as your age and gender;
- **Commercial Information**, such as products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- **Internet/Network Information**, such as device information, logs and analytics data;
- **Geolocation Data**, such as your approximate location based upon your IP address;
- **Professional/Employment Information**, such as licensure information if you are a Grow Professional;
- **Other Personal Information**, including information you submit into the feedback forms and any communications between you and Grow Therapy, as well as information we receive from social networking sites; and
- **Inferences**, such as information generated from your use of the Services reflecting your interests and preferences.
- **Sensitive Personal Information**: login credentials to access your account with the Services. We do not use or disclose sensitive personal information for purposes beyond those permitted by the CCPA.

We collect this information from a variety of sources, including directly from you, from your employer or organization, from our customers and other users, from our business partners and affiliates, from your browser or device when you use our Services, or from third parties that you permit to share information with us. Please see the **Our Collection of Personal Information** section of the Privacy Policy for more information about the sources of personal information we collect.

### ***Disclosure of Personal Information***

In the last 12 months, we may have disclosed all of the categories of information we collect with third parties for a business purpose or as legally required, as described in the **Our Disclosure of Personal Information** section of this Privacy Policy. The categories of third parties to whom we sell or disclose your personal information for a business purpose include:

- Service providers and advisors that perform services for us, on our behalf, which may include providing marketing and advertising services, providing mailing or email services, tax and accounting services, data enhancement services, fraud prevention, web hosting, or similar services;
- Select marketing and strategic providers who use this information to market to you, to perform analytics and conduct research, or for other purposes;
- Ad networks and advertising providers, including social networks, to deliver advertising and personalized content to you on our services, on other sites and services you may use, and across other devices you may use, as well as provide advertising-related services such as reporting, attribution, analytics, and market research;
- Social networks for advertising or personalization purposes, or to engage with you.
- Analytics providers to better understand the demographics of our users and visitors, and to personalize, enhance and improve our Service;

- We may also disclose personal information to other third parties at your direction or upon your request, or to comply with legal process or contractual obligations, as described in this Privacy Policy.

### ***Sales of Personal Information and Sharing for Targeted Advertising***

In the previous 12 months, we have sold the following categories of personal information to third parties, subject to your settings and preferences and your Right to Opt Out:

- Identifiers
- Commercial Information
- Internet / Network Information

In addition, please see [Third-Party Data Collection and Online Advertising](#) section of the Privacy Policy to learn more about how third-party advertising networks, social media companies, and other third-party businesses collect and disclose your personal information directly from your browser or device through cookies or tracking technologies when you visit or interact with our Services or otherwise engage with us.

### ***Minors***

We do not sell the personal information and do not have actual knowledge that we sell the personal information of minors under 16 years of age. Please contact us at [support@growththerapy.com](mailto:support@growththerapy.com) to inform us if you, or your minor child, are under the age of 16.

If you are under the age of 18 and you want to remove your name or comments from our website or publicly displayed content, please contact us directly at [support@growththerapy.com](mailto:support@growththerapy.com).

### ***Shine the Light Disclosure***

The California “Shine the Light” law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes.

### **Additional Information for Job or Provider Applicants**

This section supplements the information provided above and describes the additional personal information we collect when you apply for a position with us or join our network as a Grow Professional. We may collect the personal information in the below list in the following ways: directly from you; from publicly available sources, such as government entities, public records systems, and social media networks; data analytics providers and data brokers; or as you may otherwise authorize, such as a former employers or references.

Please note if you use our Services in the application process, additional information is collected, as described above. We may collect the personal information categories listed in Cal. Civ. Code § 1798.80(e) (the California Customer Records Statute) in addition to the categories of personal information listed below. Items with an asterisk (\*) may be considered “sensitive” personal information according to the CCPA.

- Identifiers\*: Government-issued identification numbers, including your Social Security, driver’s license, passport, state identification card, or military identification card numbers;
- Demographics and Protected Classifications\*: citizenship, gender, data of birth, age, and other traditionally protected classifications that you chose to disclose, such as race and ethnicity, marital status, sexual orientation, veteran or military status, disability, and medical status;
- Professional or Employment Related Information: credentialing information, professional associations and employment history, including name of employer, position, employer contact information, and associated employment records;
- Educational Information: educational institutions attended, degrees and certifications attained, and other educational or student records, which may include details about attendance, grades, and academic and disciplinary history.

We generally collect this personal information in order to evaluate your application for employment. For more details about how we use and disclose the personal information listed here, please refer to [Our Collection of Personal Information](#) and [Our Disclosure of Personal Information](#) above.

