

## PRIVACY POLICY

Last updated on 04/29/21

*We may change this privacy notice from time to time—when we do, we will inform you via our website: [www.toctherapy.org](http://www.toctherapy.org)*

Please carefully read the following Privacy Policy of TOC Therapy and all of its subsidiaries, successors in interest, and assigns (collectively, TOC “Therapy”, “us”, “we”) before using [toctherapy.org](http://toctherapy.org) all related websites, products, services and related mobile applications (the “Services”), (collectively, the “Site”). By using the Website you consent to this Privacy Policy. This means that you accept, agree to be bound, and abide by the Privacy Policy. If you do not agree to the Privacy Policy cease use of this Website immediately.

Your privacy is very important to us. Our Privacy Policy spells out TOC Therapy’s commitment to respecting the privacy of the members and visitors to our Site. We reserve the right to change this policy at any time, which we’ll do through online posting or an email message sent directly to you. We are very careful with what we do with your information.

This Privacy Policy governs your access to and use of [www.toctherapy.org](http://www.toctherapy.org) including any content, functionality and services offered on or through this Website whether as a guest or a registered user. This Privacy Policy also describes how TOC Therapy collects and uses the personal information you provide to us on our Site. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

### Collection and Use of Personal Information

We collect personal information from you to provide an efficient, meaningful and customized experience for you on the Site.

We collect the following personal information from you:

- *Contact Information such as name, email address, mailing address and phone number*

As is true of most websites, we automatically gather information about your computer such as:

*Your IP address, time and date of visit, browser type, referring/exit pages, operating system, agent version, platform, SDK version, timestamp, API key*

*(identifier for application), application version, device identifier, iOS Identifier for Advertising, iOS Identifier for Vendors, Media Access Control (MAC) address, International Mobile Equipment Identity (IMEI), Model, manufacture and OS version of device, session start/stop time, locale (specific location where a given language is spoken), time zone, and network status (WiFi, etc.).]*

We may log this information for: *system administration and improvement, order verification, marketing and system troubleshooting purposes.]*

We use this information to:

- *Respond to your questions and concerns*
- *Make appointments you request*
- *Improve our website and marketing efforts*
- *Conduct research and analysis*
- *Display content based upon your interests*

## How Do we Protect Your Information and Secure Information Transmissions?

We employ commercially reasonable methods to ensure the security of the information you provide to us and the information we collect automatically. This includes using standard security protocols and working only with reputable third-party vendors.

Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk.

## Information Sharing

We will share your personal information with third parties only in the ways that are described in this privacy statement. We may share personal information with certain third parties in the U.S. that perform services on our behalf. The services provided by those third parties may include: *operating the website, hosting the website, providing the products and services you request*. Those third parties are not authorized to use or disclose personal information you provide to us on or through this website for any purpose other than to perform the services designated by us.

We and our third party service providers in the U.S. may also disclose your personal information:

- As required or permitted by law such as to comply with a subpoena, in response to a search warrant or other legally valid inquiry, order or similar legal process;

- To investigate both in the case of a breach of an agreement or contravention of law;
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, establish, exercise or defend a legal claim, investigate fraud or respond to a government request;
- To any other third party with your prior consent to do so.

If TOC Therapy engages in a joint promotion with an affiliate and/or partner, we may share your contact information with our affiliate and/or partner to be used in relation to the promotion.

We may share non-personal information (such as the number of daily visitors to a particular web page or the size of an order placed on a certain date) with third parties such as advertising partners. This information does not directly identify you or any user by name.

### Third Party Websites

Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site, and another entity may collect personal information from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your personal information after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

### Cookies and Other Tracking Technologies

This Site uses cookies and other tracking. Cookies are small text files of information stored by the Internet browser on your computer's hard drive. For example, we may use cookies to collect browsing data to keep track of your preferences and profile information and to collect general usage and volume statistical information. Our cookies do not collect personal or confidential information and are not spyware. Some of our cookies are served by us, and some are served by third parties who are delivering services on our behalf.

You may set your Internet web browser to refuse cookies or to remove cookies from your hard drive. You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful

information on cookies and how to block them using different browsers. By blocking or deleting cookies used on our website and mobile application, you may not be able to take full advantage of our services.

The Company reserves the right to use technological equivalents of cookies, including social media pixels. These pixels allow social media sites to track visitors to outside websites so as to tailor advertising messages users see while visiting that social media website. The Company reserves the right to use these pixels in compliance with the policies of the various social media sites.

### **Children Under the Age of 13**

This Site is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [thepractice@toctherapy.org](mailto:thepractice@toctherapy.org)

### **Email Policies**

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease our subscription lists to third parties, and will not disclose your email address to any third parties except as allowed in the section titled Information Sharing.

We will maintain the information you send via e-mail in accordance with applicable federal law.

In compliance with the CAN-SPAM Act, all e-mails sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all e-mail messages will also contain concise information on how to remove yourself from our mailing list so that you receive no further e-mail communication from us.

TOC Therapy does not have a newsletter but we may contact you in response to our waitlist or appointments. You may inform us if you no longer wish to be contacted by us by simply replying to our email and stating so.

## Notification of Privacy Statement Changes

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this policy for the latest information on our privacy practices.

## Non-United States Visitors

If you are a non-U.S. user of the Site, by visiting the Site and providing us with data, you acknowledge and agree that your personal information may be processed for the purposes identified in the Privacy Policy. In addition, your personal information may be processed in the country in which it was collected and in other countries, including the United States where laws regarding processing of personal information may be less stringent than the laws in your country and where your personal information may be accessed by the courts, law enforcement and national security authorities as required under the laws of those jurisdictions. By providing your data, you consent to such transfer.

## GDPR

If you are within the European Union, you are entitled to certain information and have certain rights under the General Data Protection Regulation. Those rights include:

- We will retain the any information you choose to provide to us until the earlier of: (a) you asking us to delete the information, (b) our decision to cease using our existing data providers, or (c) the Company decides that the value in retaining the data is outweighed by the costs of retaining it.
- You have the right to request access to your data that the Company stores and the rights to either rectify or erase your personal data.
- You have the right to seek restrictions on the processing of your data.
- You have the right to object to the processing of your data and the right to the portability of your data.
- To the extent that you provided consent to the Company's processing of your personal data, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based upon consent that occurred prior to your withdrawal of consent.
- You have the right to lodge a complaint with a supervisory authority that has jurisdiction over issues related to the General Data Protection Regulation.

- We require only the information that is reasonably required to enter into a contract with you. We will not require you to provide consent for any unnecessary processing as a condition of entering into a contract with us.

For further information on each of these rights (including the circumstances in which they may apply), see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

We hope that we can resolve any query or concern you raise about our use of your information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

## CCPA [MOU2]

You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

### ***Disclosure of Personal Information We Collect About You***

You have the right to know:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting or selling personal information;
- The categories of third parties with whom we share personal information, if any; and
- The specific pieces of personal information we have collected about you.
- Please note that we are not required to:
  - Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;

- Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
- Provide the personal information to you more than twice in a 12-month period.

### ***Personal Information Sold or Used for a Business Purpose***

In connection with any personal information we may sell or disclose to a third party for a business purpose, you have the right to know:

- The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and
- The categories of personal information that we disclosed about you for a business purpose.
- You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale [or disclosure] of your personal information. If you exercise your right to opt-out of the sale [or disclosure] of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information. To opt-out of the sale [or disclosure] of your personal information, visit our homepage and click on the Do Not Sell My Personal Information link here: [URL].

### ***Right to Deletion***

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.
- Please note that we may not delete your personal information if it is necessary to:
  - Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

### ***Protection Against Discrimination***

You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:

- Deny goods or services to you;
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Provide a different level or quality of goods or services to you; or
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.
- \*Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information.

## Exercising your Privacy Rights & Contact Information

If you would like to exercise any of your rights as described in this Privacy Policy, please: Email us at:

TOC Therapy

[thepractice@toctherapy.org](mailto:thepractice@toctherapy.org)

626.604.0802

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.