Privacy Policy

Effective date: 4-26-2025

At Pleiades Mental Health, Inc. ("PMH"), we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and disclose your information as described in this Privacy Policy.

Remember that your use of PMH's Services is at all times subject to our <u>Terms of Use</u>, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking above.

As we continually work to improve our Services, we may need to change this Privacy Policy from time to time. We will alert you of material changes by placing a notice on the PMH website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

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What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" or "sensitive personal information" under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

Category of Personal Data (and Examples)	Business or Commercial Purpose(s) for Collection	Categories of Third Parties With Whom We Disclose this Personal Data
Profile or Contact Data such as first and last name, email, phone number, address, and unique identifiers.	 Providing, Customizing and Improving the Services Corresponding with You 	 Service Providers Business Partners Parties You Authorize, Access or Authenticate
Identifiers such as social security number, birthday, driver's license number, state identification card, insurance card, , cultural or social identifiers (for example, being a skateboarder, a Green Bay Packers fan, an environmental activist, religious or philosophical beliefs, etc.)	 Providing, Customizing and Improving the Services Corresponding with You 	 Service Providers Business Partners Parties You Authorize, Access or Authenticate
Payment Data such as financial account information, payment card type, last 4 digits of payment card, and billing address, phone number, and email.	 Providing, Customizing and Improving the Services Corresponding with You 	 Service Providers (specifically our payment processing partners, currently Stripe, Inc.)
Device/IP Data such as IP address, device ID, domain server, and type of device/ operating system/ browser used to access the Services.	 Providing, Customizing and Improving the Services Corresponding with You 	 Service Providers Business Partners Parties You Authorize, Access or Authenticate
Web Analytics such as web page interactions, referring webpage/source through which you accessed the Services, non-identifiable request IDs, and statistics associated with the interaction between device or browser and the Services.	 Providing, Customizing and Improving the Services Marketing the Services Corresponding with You 	 Service Providers Advertising Partners Business Partners Parties You Authorize, Access or Authenticate
Social Network Data such as email, phone number, user name, IP address, and device ID.	 Providing, Customizing and Improving the Services Marketing the Services Corresponding with You 	 Service Providers Advertising Partners Business Partners Parties You Authorize, Access or Authenticate
Consumer Demographic Data such as age and/or date of birth, zip code, gender, race, ethnicity, and sex life or sexual orientation.	 Providing, Customizing and Improving the Services Marketing the Services Corresponding with You 	 Service Providers Advertising Partners Business Partners Parties You Authorize, Access or Authenticate

Geolocation Data such as IP-address- based location information, and GPS data.	 Providing, Customizing and Improving the Services Marketing the Services Corresponding with You 	 Service Providers Advertising Partners Business Partners Parties You Authorize, Access or Authenticate
Sensory Data such as photos, videos, or recordings of you and/or of your environment.	 Providing, Customizing and Improving the Services Corresponding with You 	 Service Providers Business Partners Parties You Authorize, Access or Authenticate
Health Data such as medical conditions, weight, health or exercise activity monitoring, genetic data, or any information concerning a consumer's health, including information about a mental or physical health condition or diagnosis.	 Providing, Customizing and Improving the Services Corresponding with You 	 Service Providers Business Partners Parties You Authorize, Access or Authenticate Service Providers

Other Identifying Information that You	Providing, Customizing and	Service Providers
Voluntarily Choose to Provide such as	Improving the Services	 Business Partners
emails, letters, texts, posts, or other	 Corresponding with You 	 Parties You Authorize, Access or
communications you send us,		Authenticate
communications with our Counselor, as		
well as Content you create, share, or		
post on the Oasis platform.		
This may include categories of Data		
Considered "Sensitive" Under the		
State Privacy Laws (as defined below)		
such as:		
 Race or ethnic origin; 		
 Citizenship status; 		
• Genetic data;		
Biometric data;		
Health Data; Sovual arientation:		
 Sexual orientation; Provise geologistication; 		
Precise geolocation;		
Immigration status;		
Religious beliefs;		
• Sex life;		
 National origin; 		
 Status as transgender or non-binary; 		
 Status as a victim of crime; 		
• Biological data, including neural data;		
 Personal identification numbers, 		
including social security, driver's		
license, passport, or state ID card		
numbers;		
 A person's account log-in, financial 		
account, debit card, or credit card		
number in combination with any		
required security or access code,		
password, or credentials allowing		
access to an account;		
 Philosophical beliefs; 		
• Union membership;		
• Contents of a consumer's mail, email,		
and text messages where PMH is not		
the intended recipient of the		
communication.		
This may also include "Sensitive Data		
Inferences" Under the Colorado		
Privacy Act such as inferences		
reflecting racial or ethnic origin,		
religious beliefs, mental or physical		
health condition or diagnosis, sex life or		
sexual orientation, and citizenship or		
citizenship status.		

Our Commercial or Business Purposes for Collecting Personal Data

• Providing, Customizing and Improving the Services

- Creating and managing your account or other user profiles.
- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- \circ $\;$ Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Services.
- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such the Colorado Privacy Act (the "CPA")(collectively, the "State Privacy Laws").
- Automated processing done in furtherance of making a decision that produces legal or similarly significant effects concerning you, as described in our "Profiling Opt-Out" section below.
- Marketing the Services
 - Marketing and selling the Services.
- Corresponding with You
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about PMH or the Services.
 - \circ $\;$ Sending emails and other communications according to your preferences.

Other Permitted Purposes for Processing Personal Data

In addition, each of the above referenced categories of Personal Data may be collected, used, and disclosed with the government, including law enforcement, or other parties to meet certain legal requirements and enforcing legal terms including: fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities; protecting the rights, property or safety of you, PMH or another party; enforcing any agreements with you; responding to claims that any posting or other content violates third-party rights; and resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice or obtaining your consent.

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- You
 - When you provide such information directly to us.
 - When you create an account or use our interactive tools and Services.
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
 - When you send us an email or otherwise contact us.
 - When you use the Services and such information is collected automatically.
 - Through Cookies (defined in the "Tracking Tools, Advertising and Opt-Out" section below).

- If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
- If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.

Public Records

- From the government or other sources.
- Third Parties
 - <u>Counselors.</u> We may receive Personal Data about you from a Counselor in the course of providing or coordinating Counseling Sessions.
 - Third-Party Credentials

If you provide your third-party account credentials, such as your social network account credentials, to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

How We Disclose Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a "sale" of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Analytics providers for web traffic or usage of the site.
 - Security and fraud prevention consultants.
 - Support and customer service vendors.
 - Product fulfillment and delivery providers.
 - Payment processors.
 - Our payment processing partners, Stripe, Inc. ("Stripe") and Availity, LLC ("Availity") collects your voluntarily-provided payment card information necessary to process your payment.
 - Please see Stripe's and/or Availity's terms of service and privacy policy for information on its use and storage of your Personal Data.
- Business Partners. These parties partner with us in offering various services. They include:
 - Businesses that you have a relationship with.
 - Companies that we partner with to offer joint promotional offers or opportunities.
- Parties You Authorize, Access or Authenticate
 - Third parties you access through the services.
 - Social media services.
 - Other users.

Counselors

 We may disclose your Personal Data to your counselor or therapist in connection with the provision of Telehealth or therapy services. For example, during a virtual therapy session, your counselor may receive information such as your name, contact details, appointment history, self-reported symptoms, responses to mental health questionnaires, or other relevant notes necessary for your care and support.

Legal Obligations

We may disclose any Personal Data that we collect with third parties in conjunction with any of the activities set forth under "Other Permitted Purposes for Processing Personal Data" section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and disclose it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not disclose such data in a manner that could identify you.

Tracking Tools, Advertising, and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "Cookies") to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s).

Please note that because of our use of Cookies, the Services do not support "Do Not Track" requests sent from a browser at this time.

We use the following types of Cookies:

- <u>Essential Cookies</u>. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- <u>Functional Cookies</u>. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

<u>Performance/Analytical Cookies</u>. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and disclose information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at https://tools.google.com/dlpage/gaoptout/.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you or to modify your preferences with respect to Cookies, you can access your Cookie management settings by <u>clicking</u>. To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit http://www.allaboutcookies.org/ or https://ico.org.uk/for-the-public/online/cookies/ if you are located in the European Union.

Data Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

Data Retention

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. We will also retain your information to comply with applicable personal health information laws. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

For example:

- We retain your profile information and credentials for as long as you have an account with us.
- We retain your payment data for as long as we need to process your purchase or subscription.
- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data from children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as quickly as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, please contact us at support@pleiadesmh.com.

[The Children's Online Privacy Protection Act ("COPPA") requires that online service providers obtain parental consent before they knowingly collect personally identifiable information online from children who are under 13 years of age. We do not knowingly collect or solicit personally identifiable information from a child under 13 without obtaining verifiable consent from that child's parent or guardian ("Parental Consent"), except for the limited amount of personally identifiable information we need to collect in order to obtain Parental Consent ("Required Information"). Until we have received Parental Consent, we will only use Required Information for the purpose of obtaining Parental Consent. If you are a child under 13 years of age, please do not attempt to send any Personal Data about yourself to us before we obtain Parental Consent, except for the Required Information in the context of the Parental Consent process. If you believe that a child under 13 years of age has provided us with Personal Data (beyond the Required Information) without our obtaining Parental Consent, please contact us at support@pleiadesmh.com. We do not condition participation in our Services on disclosure of more Personal Data from a child under 13 years of age than is reasonably necessary for that participation, and we do not retain Personal Data from children under 13 years of age longer than is reasonably necessary in order to fulfill the purpose for which it was disclosed.

If you are a parent or guardian of a user of our Services who is under 13 years of age, you may contact us at any time to ask that (a) we stop collecting Personal Data from such user, (b) we delete any Personal Data already collected from such user (although note that we may further retain information in an anonymous or aggregated form where that information would not identify such user personally), or (c) we stop disclosing Personal Data collected from such user to third parties, but continue to allow for collection and use of Personal Data collected from such user in connection with the Services.

Colorado Resident Rights

If you are a Colorado resident, you have the rights set forth under the Colorado Privacy Act ("CPA"). Please see the "Exercising Your Rights under the State Privacy Laws" section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a Colorado resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at support@pleiadesmh.com.

<u>Access</u>

You have the right to request confirmation of whether or not we are processing your Personal Data and to access and request a copy of your Personal Data in a machine-readable format, to the extent technically feasible, twice within a calendar year.

<u>Correction</u>

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

<u>Deletion</u>

You have the right to delete Personal Data concerning you.

Personal Data Sales and Targeted Advertising Opt-Out

We do not currently sell or process for the purposes of targeted advertising your Personal Data as defined under the CPA.

Consent or "Opt-in" Required and How to Withdraw

We may seek your consent to collect or process certain Personal Data, including: 1) Sensitive Data, 2) Personal Data from a known child under 13 years of age, 2) to sell, or process Personal Data for Targeted Advertising or Profiling after you exercise your right to opt-out, or 4) Personal Data for Secondary Use.

If you would like to withdraw your consent, please follow the instructions under the "Exercising Your Rights under State Privacy Laws" section.

We Will Not Discriminate Against You

We will not process your personal data in violation of state and federal laws that prohibit unlawful discrimination against consumers.

Exercising Your Rights under the State Privacy Laws

To exercise the rights described in this Privacy Policy, you or, if you are a Colorado resident, your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the time period required by applicable law. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or

manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

Request to Opt-Out of Share,

You may opt-out from any "sales," "shares," or targeted advertising, by using the following methods:

- WE Do Not Sell or Share Personal Information
- Email us at support@pleiadesmh.com.
- By accessing your cookie consent mechanism by accessing your "Cookie Settings" at the bottom left of our website.
- By implementing the Global Privacy Control or similar universal privacy control that is legally recognized by a government agency or industry standard and that complies with applicable State Privacy Laws. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this [does / does not] include Do Not Track signals.

Request to Opt-Out of Profiling

If you are a Colorado resident, you may opt-out of Profiling for Decisions. You can opt-out using the following methods:

- You can complete the online form found here: Do Not Profile in Furtherance of Legally Significant Decisions https://pleiadesmh.com/mainwebsite/contactus.html.
- Email us at support@pleiadesmh.com.

Request to Withdraw Consent to Certain Processing Activities

If you are a Colorado resident, you may withdraw your consent allowing us: 1) to process your Sensitive Data (including Sensitive Data Inferences), 2) to process your Personal Data if you are a known child under 13 years of age, 3) to sell, or process your Personal Data for Targeted Advertising or Profiling after you have exercised your right to opt-out, or 4) to process your Personal Data for Secondary Use, by using the following methods:

- You can request an online form here: <u>"Withdraw My Consent"</u>.
- Email us at support@pleiadesmh.com

Request to Access, Delete, or Correct

You may submit a Valid Request for any other rights afforded to you in this Privacy Policy by using the following methods:

- Email us at: support@pleiadesmh.com
- Submit a form at this address: <u>https://pleiadesmh.com/mainwebsite/contactus.html</u>

If you are a Colorado resident, you may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to

exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

<u>Appealing a Denial</u>

If you are a Colorado resident and we refuse to take action on your request within a reasonable period of time after receiving your request in accordance with this section, you may appeal our decision. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the State Privacy Laws (as applicable). We will respond to your appeal within the time period required under the applicable law. You can submit a Verified Request to appeal by the following methods:

- Email us at: support@pleiadesmh.com (title must include "[STATE OF RESIDENCE] Appeal")
- Submit a form at this address: <u>https://pleiadesmh.com/mainwebsite/contactus.html</u>

If we deny your appeal, you have the right to contact the Attorney General of your State, including by the following links: <u>Colorado</u>.

Other State Law Privacy Rights

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time. To find out more about "Do Not Track," you can visit <u>www.allaboutdnt.com</u>.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- {Phone} (PMH doesn't have any of these yet)
- pleideasmh.com
- support@pleiadesmh.com
- Will use CO Secretary of State registered agent address for now.