

Privacy Policy

The Privacy Policy explains how Huddle Behavioral Health, Inc. may collect, use, disclose, and secure information we obtain through the “Service.” The terms “**Huddle Behavioral Health**,” “**Huddle.care**,” “**we**,” and “**us**” include Huddle Behavioral Health, Inc. Any capitalized terms used and not defined in this Privacy Policy shall have the meaning given to them in the applicable Terms of Service and/or EULA linking to this Privacy Policy.

“Personal Information” can be used to readily identify, contact, or locate you.

“ **Personal Information** ” means information that alone or when in combination with other information may be used to readily identify, contact, or locate you, such as: name, address, email address, or phone number. Except where required by law, we do not consider Personal Information to include information about a device, including device identifiers, or information that has been anonymized so that it does not allow a third party to easily identify a specific individual.

THE SERVICE COLLECTS YOUR INFORMATION

We collect Personal Information when you:

- register to use the Service;
- use the Service; and
- communicate with us. We also collect information, such as anonymous usage statistics, by using cookies, server logs, and other similar technology as you use the Service.

Registration and Account Information. You must register to use the Service. To register, you may need to provide Personal Information, such as your name, email address, telephone number, and password. You may also provide other optional information.

Making Payments. When you make payments through the Service, you may need to provide financial account information, such as your credit card number, to our third-party service provider, Stripe. We do not collect or store such information, though we may receive information about completed transactions that does not include credit card or bank account numbers.

Communicate with Us. We may collect Personal Information through your communications with our customer-support team or through other communications with us, including through social media.

Automatic Data Collection: Cookies and Related Technologies.

When you visit our Service or open our emails, we and our third-party partners, such as advertising networks, social media widgets, and analytics providers, may collect certain information by automated means, such as cookies, web beacons and web server logs. By using the Service, you consent to the placement of cookies, beacons, and other similar technology in your browser and on emails in accordance with this Privacy Policy. The information collected in this manner includes IP address, browser characteristics, device IDs and characteristics, operating system version, language preferences, referring URLs, and information about the usage of our Service. We may use this information, for example, to determine how many users have visited certain pages or opened messages or newsletters, or to prevent fraud. We may link this data to your profile. Our partners also may collect information about your online activities over time, on other devices, and on other websites or apps, if those websites and apps also use the same partners. When they provide such services, they are governed by their own privacy policies. We currently use Google Analytics to collect and process certain website usage data. To learn more about Google Analytics and how to opt out, please visit www.google.com/policies/privacy/partners/. You may be able to change browser settings to block and delete cookies when you access the Service through a web browser.

By using the Service, you are authorizing us to gather, parse, and retain data related to the provision of the Service. We may retain such information, including Personal Information, indefinitely.

HOW HUDDLE BEHAVIORAL HEALTH, INC. USES YOUR INFORMATION

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We use Personal Information to:

- facilitate and improve our services; and
- communicate with you. We may use anonymized information for any purpose, including for marketing purposes.

Internal and Service-Related Usage. We use information, including Personal Information, for internal and service-related purposes, such as to provide you with analysis and reports. We may use and retain any data we collect to provide and improve any of our services.

Communications. We may send email to the email address you provide to us and push notifications to your mobile device if they are enabled, to verify your account, prompt you to respond to messages through the Service, and for informational and operational purposes, such as account management, customer service, system maintenance, and other Service-related purposes.

Marketing. Where permitted by law, we may use information, including Personal Information, to send you information we think may be useful or relevant to you. You may opt out of email marketing by using the unsubscribe link in a marketing email.

Aggregate Data. We may anonymize or aggregate data collected through the Service and use and disclose it for any purpose.

HUDDLE BEHAVIORAL HEALTH, INC. MAY DISCLOSE YOUR INFORMATION

We may share your Personal Information:

- with our third-party vendors and service providers;
- with your therapist or as directed by your therapist;
- to comply with legal obligations;
- to protect and defend our rights and property; and
- with your permission.

We do not rent, sell, or share Personal Information about you with other people or nonaffiliated companies for their direct marketing purposes, unless we have your permission.

With Third Parties at the Direction of Therapists. Therapists may direct us to disclose information about their patients with third parties.

Marketing. We do not rent, sell, or share personal information (as defined by California Civil Code § 1798.83) about you that we collect on the Service with other people or unaffiliated companies for their direct marketing purposes, unless we have your permission. We may allow access to data collected by the Service to enable us to send you information we think may be useful or relevant to you.

Legal and Similar Disclosures . We may access, preserve, and disclose collected information, if we believe doing so is required or appropriate to: comply with law enforcement requests and legal process, such as a court order or subpoena; respond to your requests; comply with the law; or protect your, our, or others' rights, property, or safety.

Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of Huddle Behavioral Health assets, or transition of

service to another provider, your information may be disclosed in connection with the negotiation of such transaction, and/or sold or transferred as part of such a transaction as permitted by law and/or contract. We cannot control how such entities may use or disclose such information.

With Your Permission. We may also disclose your Personal Information with your permission.

YOUR RIGHTS AND CHOICES REGARDING YOUR INFORMATION

We offer you certain choices in connection with the information we collect about you.

Subject to applicable law, patients may have the right to request access to the information we maintain about them, update and correct inaccuracies in their information, and have the information deleted, as appropriate. Patient rights to their information may be limited in some circumstances by legal requirements. For example, patients may update their email address, telephone number, and password, but patients cannot delete their responses to questions made through the Service. Therapists may change certain patient information, such as therapy goal and diagnosis, and they can delete any of the information retained by the Services for them, including information relating to their patients, according to their agreement with us. If you wish to request access or an update to the information that we have concerning you, please use the Service, contact your therapist, or email us at info@therachat.io.

We will retain information provided by patients to a therapist, in accordance with any agreements we have with such therapists, and we may retain information after patients terminate their account. When we delete any information, it will be deleted from the active database, but may remain in our archives. You may terminate your account at any time by following the procedures detailed on the Service or by contacting customer support at team@huddle.care.

If you receive marketing email from us, you may unsubscribe at any time by following the opt-out instructions contained within the message. Even after you opt-out of receiving promotional messages from us, you may continue to receive administrative messages from us regarding the Service. You may turn off push notifications through your device settings.

We will continue to use and disclose de-identified and/or aggregated information for our business purposes, as permitted under applicable law, and to comply with our legal obligations, agreements with therapists, resolve disputes, enforce our rights, or similar purposes.

INFORMATION SECURITY

We take steps in an effort to treat your information securely.

We take steps in an effort to treat your information securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Service or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Service or sending an email to you.

CHILDREN'S PRIVACY

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of the Service is directed to children under the age of 13. If you learn that

We do not knowingly collect personal information from children under 13. We will take steps to delete it if we learn we have collected it.

If your child has provided us with personal information without your consent, you may alert us at team@huddle.care. If we learn that we have collected any personal information from children under 13, we will promptly take steps to delete such information and terminate the child's account.

INTERNATIONAL USERS

By using the Service, you will transfer data to the United States.

If you are visiting from the European Union or other regions with laws governing data collection and use, you agree to the transfer of your information to the United States and processing globally. By providing your information you consent to any transfer and processing in accordance with this Privacy Policy.

UPDATE YOUR INFORMATION OR POSE A QUESTION OR SUGGESTION

If you would like to request that we update or correct any information that you have provided to us through your use of the Service or otherwise, or if you have suggestions for improving this Privacy Policy, please send an email to team@huddle.care.

CHANGES TO OUR PRIVACY POLICY AND PRACTICES

We may revise this Privacy Policy, so review it periodically.

Posting of Revised Privacy Policy. We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective when it is posted.

New Uses of Personal Information. From time to time, we may desire to use Personal Information for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected Personal Information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, we will make reasonable efforts to provide

notice and obtain consent to any such uses as may be required by law.

Contact Information

220 N. Green St.

Chicago, IL 60607

team@huddle.care

Effective Date: December 20, 2017

Last Update: December 20th, 2017