

Grow Therapy Privacy Policy

Effective Date: January 1st, 2022

Your privacy is important to Grow Therapy, so we've developed this Privacy Policy to explain how we use your personal information. When we use the term "**personal information**" in this Privacy Policy, we mean information about you that is personally identifiable to you.

In order to understand how we use your personal information, we need to explain Grow Therapy's legal organization because it affects how we use your personal information. As further described in our Terms of Use, Grow Care, Inc. operates the Site. An associated but independent group of affiliated clinical practices ("**Grow Professionals**") provides the licensed professionals who treat Members on the Site. Both Grow Care, Inc. and Grow Professionals (collectively, "**Grow Therapy**", "**we**", and "**us**") may use and disclose your personal information collected through the Site, but how they use and disclose that information depends on whether it is health information or another type of personal information.

We believe that your health information should have heightened privacy protections, which is also required by federal and state laws. All collection, use, and disclosure of your health information through the Site is governed by Grow Professionals' Health Information Privacy Policy. When you create an Account and log in to the Site using your Account Information, you access a secure patient portal. We treat all health information that you provide when creating an Account and in the patient portal as health information under Grow Professionals' Health Information Privacy Policy. That means if we need to collect, use, or disclose that health information for any reason, we follow the Health Information Privacy Policy. Please review the Health Information Privacy Policy for more information on how we protect your health information and your rights under applicable laws.

This Privacy Policy explains how we collect, use, and disclose your other personal information that is not health information. By using the Site, you agree that we can collect and use your personal information as described in this Privacy Policy. If you do not agree, please do not use the Site.

The personal information we collect or maintain may include:

- **Site Activity Information.** We track certain actions you take on the Site such as the content of searches performed on the Site and information that you enter into the Site (e.g. your name and email address when signing up for an email newsletter, requesting more information about us and our Services, etc.).
- **Access Device and Browser Information.** When you access the Site from a computer or other device, we may collect information from that device, such as your internet protocol address, browser type, connection speed, device model, operating system version, and access times.
- **Cookies.** We may use both session Cookies (which expire once you close your web browser) and persistent Cookies to make the Site and Services easier to use, to make our advertising better, and to protect both you and Grow Therapy. For more information about our use of Cookies and to opt out of performance, functionality, or targeting cookies please visit our cookie preference center.

- Analytics Tools.** We use tools such as Google Analytics, Full Story and Mixpanel to help analyze how individuals use the Site. Such third parties may use Cookies, APIs, and SDKs in our services to enable them to collect and analyze user and device related data and information on our behalf. Google Analytics, Full Story, and Mixpanel use Cookies to collect information such as how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get to improve our Site and Services. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>. Mixpanel’s ability to use and share information it collects about your visits to the Site is restricted by the Mixpanel Terms of Use located at <https://mixpanel.com/terms/> and the Mixpanel Privacy Policy located at <https://mixpanel.com/privacy/>. You can opt-out of Mixpanel’s automatic retention of data collected through your browsers while on our Site by clicking on this link <https://mixpanel.com/optout/>. To track opt-outs, Mixpanel uses a persistent opt-out Cookie placed on your devices.
- Certain features of the Site use GPS technology to collect real-time information about the location of your device so that the Site can connect you to a Healthcare Professional who is licensed or authorized to provide Services in the state where you are located. Strictly necessary and functionality Cookies are used on our Site to support Site functionality and security. These Cookies collect crash analytics and Site activity data, as well as provide security measures.
- We may collect information from your mobile device or computer including the type of device used to access the Site, operating system version, and mobile device carrier. This information is used to identify and fix bugs and otherwise improve the performance of the Site.

In many circumstances, the information listed above is non-personal information. For example, the information collected through Cookies may not contain any identifiable personal information. We will still treat that information as personal information under this Privacy Policy if (a) an applicable local law considers it to be personal information or (b) we combine it with personal information.

De-identified information.

We may use de-identified information created by us without restriction. When we use the term “**de-identified information**,” we mean information that is neither used nor intended to be used to personally identify an individual.

Children under age 18.

We do not knowingly allow individuals under the age of 18 to create Accounts that allow access to our Site. Children under the age of 18 may only use the Site and Services in accordance with our Terms of Use, 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.

We may use your personal information for the following purposes:

- To provide you with the Site and full functionality on the Site.
- To notify you when Site updates are available.
- To market and promote the Site and the Services to you.
- To create de-identified information such as aggregate statistics relating to the use of the Site.
- To fulfill any other purpose for which you provide us personal information.

We may also disclose personal information that we collect or you provide:

- To our subsidiaries, affiliates, and associated organizations.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential.
- As required by law, which can include providing information as required by a court order.
- When we believe in good faith that disclosure is necessary to protect your safety or the safety of others, to protect our rights, to investigate fraud, or to respond to a government request.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Grow Therapy's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information maintained by the Site is among the assets transferred.
- For any other purpose disclosed by us when you provide the information.

Disclosure to third parties.

At times we may provide third parties with certain personal information to provide or improve our products and services, including to help us market to consumers. When we do, we require those third parties to handle it in accordance with applicable laws. We do not sell personal information, and personal information will not be shared with third parties for their marketing purposes.

This Privacy Policy applies only to information we collect through the Site. This Privacy Policy DOES NOT apply to information collected by any third party. When you click on links on the Site you may leave our Site. We are not responsible for the privacy practices of other sites, and we encourage you to read their privacy statements.

Modification of information.

Members will be able to update some of their information through the Site. Requests to modify any information may also be submitted to support@growththerapy.com.

Limitations on deletion of information.

You may request deletion of your personal information by us, however, we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain

time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete personal information, it will be deleted from the active database, but may remain in our archives (subject to applicable law) and we may also retain anonymous information about your use of our services. Once we disclose some of your personal information to third parties, we may not be able to access that personal information any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures. After we delete personal information, we may retain de-identified information and will continue to use de-identified information as permitted under this Privacy Policy.

Steps we take to keep your information secure.

We employ reasonable physical, electronic, and managerial security methods to help protect against unauthorized access to personal information, such as encryption. But please be aware that no data transmission over the Internet or data storage facility can be guaranteed to be perfectly secure. As a result, while we try to protect your personal information, we cannot ensure or guarantee the security of any information you transmit to us.

Right to non-discrimination.

We will not discriminate against you for exercising any of your privacy rights under law, or as set forth in this Privacy Policy.

California.

In addition to the rights above, the California Consumer Privacy Act provides California consumers with certain rights, such as the right to obtain from us information about the personal information about you that we collect, use, and disclose. You can exercise your rights by sending an email to support@growththerapy.com.

If you choose to exercise your privacy rights, you will not receive discriminatory treatment or a lesser degree of service from us.

Changes to the Privacy Policy.

We may change the Privacy Policy from time to time in the future. We will post any revised version of the Privacy Policy on this page. Continued use of our services following notice of such changes will indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes. By using the Site, you are agreeing to our collection, use and disposal of personal information and other data as described in this Privacy Policy, both as it exists now and as it is changed from time to time.

All capitalized terms in the Grow Therapy Privacy Policy not defined herein shall have the meaning set forth in the Grow Therapy Terms of Use.

If you have questions or concerns about our Privacy Practices, or would like to report a violation, please contact us by sending an email to support@growththerapy.com.