

We at Stride Forward Counseling LLC, (“Stride Forward Counseling” or “Company”) respect your privacy and are committed to protecting it.

This Privacy Policy applies to the personal information we obtain through the Stride Forward Counseling’s properties, including websites, mobile applications, patient portal, and social media pages that reference this Privacy Policy (“Online Channels”); offline collection in connection with sales, marketing, partner and supplier engagement (“Offline Channels”); and third-party sources, including ad networks in accordance with applicable law (collectively, the “Channels”). This Privacy Policy does not apply to personal information obtained through our Careers website, which is subject to the Employee and Applicant Privacy Notice.

Online Channels may provide links to other third-party websites and features, or contain third-party cookies, that are not owned or controlled by Stride Forward Counseling. Please review the privacy policies of these third parties to familiarize yourself with their practices. You may also exercise your choices regarding third-party cookies using our Cookie Consent Tool by clicking on “Cookies” at the bottom of the page.

The table below describes the personal information Stride Forward Counseling collects, why it is collected, the categories third parties it is shared with, and our purposes for sharing it. As shown below, our use of third-party cookies qualifies as “selling” and “sharing” personal information, as those terms are defined by the CCPA. Stride Forward Counseling will only retain your personal information for as long as necessary to achieve the purposes stated below, or for other permitted purposes (such as to comply with any legal obligations). Specific retention periods vary based on our business and legal needs and obligations. The details of the table that apply to your personal information can vary depending on the mechanism through which you interact with us.

This policy applies to information collected, but is not limited to:

- On this Website.
- In e-mail, text and other electronic messages between you and this Website, through other Channels.
- Social Media sites connected to the Website or Channels.
- Through patient portal and any mobile and desktop applications you download, which provide dedicated non-browser-based interaction between you and the Channels.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by the Company or any third party; or

- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time without notice. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## Contents

### Children Under the Age of 13

Our Website and other Channels are 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 we learn we have collected or received personal information from a child under 13 without verification of parental or guardian 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 [admin@strideforwardcounseling.com](mailto:admin@strideforwardcounseling.com).

### Personal Information We Obtain

We collect several types of information from and about users of our Website, including information:

- Contact information (such as name, phone, fax number, email, postal address, insurance) for you or for others (e.g., principals in your business);
- biographical and demographic information (such as date of birth, age, gender, job title/position, marital status and dependent, spousal and other family information);
- location data (such as data derived from your IP address, country and zip code) and the precise geolocation of your mobile device where we have provided notice and choice, as appropriate;
- audio, electronic, or visual information;
- contact information you provide about friends or other people you would like us to contact;
- clickstream data and other information about your online activities (such as information about your devices, browsing actions and usage patterns), including across the Online Channels and third-party websites, that we obtain through the use of cookies, web beacons, tracking script, and similar technologies (see our Cookie Consent Tool); and

- other personal information contained in content or consents you submit to us (such as through our “Contact Us” feature) by which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other information the Website collects that is defined as personal or personally identifiable information under applicable law (“personal information”); and/or
- About your internet connection, the equipment you use to access our Website and usage details.

Providing personal information to Stride Forward Counseling is voluntary on your part. If you choose not to provide us certain information, we may not be able to offer you certain products and services, and you may not be able to access certain features of the Online Channels.

By way of further explanation, the Company has collected the following categories of personal information from consumers within the last twelve (12) months: In all cases, personal information shall be limited to within the scope of applicable privacy law. Please consult our Notice of Privacy Practices regarding our use and disclosure of protected health information.

## How We Collect Information

We collect this information:

- Directly from you when you provide it to us; and
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons, and other tracking technologies.

Information You Provide to Us. The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided on our “get in touch,” “blog,” or other interactive pages.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- The Website may offer you the ability to use social media services (collectively, “Social Media”) in conjunction with the Website. When you access the Website through your Facebook or other Social Media account, we may, depending on your privacy settings, have access to information that you have provided to the Social Media platform. We may use this information for the purposes described in this Privacy Policy or at the time the information was collected.
- Note: the patient portal is governed by separate Terms of Use and Privacy Policy, accessible on the patient portal.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including traffic data, location data, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system and browser type.

## **Cookies and Similar Technologies**

Like most companies, Stride Forward Counseling uses cookies and similar technologies (collectively referred to as “Cookies”) on our websites to personalize and enhance your experience on our sites. The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of the Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

## **How We Use Cookies**

Cookies contain small amounts of information which are downloaded to your device when you visit our website. Cookies are sent back to our website to allow us to recognize your device. Strictly necessary Cookies are required for the operation of the websites. They help enable core functionality such as network management and accessibility. You can set your browser to block

or alert you about these cookies, but this may cause some parts of our websites not to work. Functional and Performance Cookies help us measure the websites' performance and improve your experience.

Marketing and Personalization Cookies track visitor activity and sessions so that we can deliver a more personalized experience. We use marketing cookies to display personalized advertisements on other websites you may visit to deliver relevant content and measure the effectiveness of our marketing investments and to send you personalized communications.

Analytics Cookies measure how you use our websites so we may continually improve them. For example, these cookies allow us to recognize and count the number of visitors to our websites and see which pages visitors view.

## **Making Cookie Choices**

You may see the list of Stride Forward Counseling and selected third-party cookies on our website and make choices about those cookies by visiting our Cookie Consent Tool, by clicking on "Cookies" at the bottom of the page. In addition to our Cookie Consent Tool, most browsers allow you to manage cookie preferences. If you decide to disable cookies on our website, you may not be able to take full advantage of all our website features once you have done so. Except for cookies that are essential to the operation of this website (Essential Cookies), you may make choices about the cookies on this website. Please note that if you choose to manage cookies on our websites, the Cookie Consent Tool will place a cookie on your device to allow your choices to be honored.

## **Sharing Tools**

To enhance your experience on our websites, we sometimes embed content and sharing tools from other third-party sites, such as "like" buttons from social networking sites; these third-party sites may also place and access cookies on your device. Stride Forward Counseling does not control the placement or access of these third-party cookies. The third parties can be found in our Cookie Consent Tool. Please review the privacy policies of these third parties to familiarize yourself with their practices. You may exercise choices regarding third party cookies using our Cookie Consent Tool, by clicking on "Cookies" at the bottom of the page.

## **How We Use Your Information**

Stride Forward Counseling may use information that we collect about you or that you provide to us, including any personal information to:

- Any other purpose with your consent;
- Provide and administer our products and services;

- Communicate about and administer our products, services, events, programs and promotions (such as by sending alerts, promotional materials, newsletters and other marketing communications, including personalized communications, through various channels, including live chat);
- Perform data analytics (such as market research, trend analysis, financial analysis and customer segmentation);
- Engage in ad retargeting and evaluate the effectiveness of our marketing efforts (including through our participation in ad networks);
- Provide customer support through various channels, including live chat, portal messaging, etc.;
- Process, evaluate and respond to requests, inquiries and applications;
- Create, administer and communicate with you about your account (including any purchases and payments);
- Conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, developing and training internal tools to better know you, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
- Payer engagement activities;
- Present our Website, Channels and its contents to you and to improve the same;
- Provide you with information, products or services that you request from us;
- Fulfill any other purpose for which you provide it;
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- Notify you about changes to our Channels or any products or services we offer;
- Allow you to participate in interactive features on our Channels;
- Any other way we may describe when you provide the information
- Operate, evaluate and improve our business (such as by administering, enhancing and improving our products and services; developing new products, services and Online Channels; managing our communications and customer relationships; improving our knowledge of our customers, and performing accounting, auditing, billing, reconciliation and collection activities);
- Verify your identity and protect against and prevent fraud and other unlawful activity, unauthorized transactions, claims and other liabilities, and manage risk exposure and quality;
- Conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms (such as this Privacy Policy and other Online Channels terms of use); and
- Maintain and enhance the safety and security of our products, services, Online Channels, network services, information resources and employees.
- Stride Forward Counseling may combine personal information that it obtains through various Channels, as well as other information, for the purposes described above. Personal information may be anonymized, aggregated or deidentified and used for the purposes described above and for other purposes to the extent permitted by applicable law. Additional purposes may be identified at the time of information collection.

- Stride Forward Counseling will obtain your consent for these additional uses to the extent required by applicable law. Where required by applicable law, we will obtain your consent for the processing of your personal information for direct marketing purposes.

## **Personal Information Retention**

Stride Forward Counseling may retain information as long as it is necessary and relevant for purposes as outlined above. In addition, we retain personal information to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Use, Patient Services Agreements, and other actions permitted by law. After it is no longer necessary for us to retain information, Stride Forward Counseling may dispose of personal information in accordance with its standard data retention and deletion policies.

## **Personal Information Sharing**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We may disclose (and have done so in regards to all categories listed above within the past twelve (12) months) personal information that we collect or you provide as described in this privacy policy:

- To contractors, service providers and other third parties we use to support our business and/or advance your services (ex. internet service provider, security consultants, data analytics, operating systems and platforms, etc.).
- 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 the Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use or other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others.

To the extent any of the disclosures above might contain any de-identified health information which nevertheless qualifies as “personal information” under the CCPA, we de-identify any such information before disclosure in accordance with HIPAA safe harbor procedures.

We do not sell or otherwise share your personal information (including any de-identified health information that qualifies as such under the CCPA) with third parties.

## **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Contact from the Company.** By accessing our Website, you consent to our contacting you regarding promotional matters. If you do not wish to have your contact information used by the Company to promote our products or services, you may send us a return e-mail asking to be omitted from future e-mail distributions. This opt out does not apply to information the Company may communicate related to transactional or legal matters.

## **Linked Websites**

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI’s website.

Stride Forward Counseling’s Website may contain links to third-party websites and services with which we have no affiliation. A link to any third-party site does not mean that we endorse it or the quality or accuracy of information/statements presented on it. If you decide to visit a linked site, you are subject to its privacy policy and practices and not this Privacy Policy. We encourage you to carefully review the legal and privacy notices of all other digital services that you visit.

## **Data Security**



We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Channels.

## **Your Rights and Choices (“Rights”)**

You have the right to request that the Company disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

### **Right to Know More Information**

You may have the right to confirm details about the personal information we have obtained and collected about you, including:

1. The categories of personal information we collected about you and sources for the personal information we collected about you.
2. Our business or commercial purpose for collecting or selling that personal information.
3. The categories of third parties with whom we share that personal information.
4. The specific pieces of personal information we collected about you (also called a data portability request).
5. If we sold or disclosed your personal information for a business purpose, two separate lists disclosing: (A) sales, identifying the personal information categories that each category of recipient purchased; and (B) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### **Right to Data Portability**

You may request to receive a copy of personal information in a readily usable format to the extent feasible.

### **Right to Delete Personal Information**

You may request to receive a copy of personal information in a readily usable format to the extent feasible. You may be entitled to have us delete personal information that we collected from you, although we may be required or permitted to retain personal information in specific instances, in which case we will inform you of our reason for not deleting personal information.

### **Right to Correct Inaccurate Information**

You may request that we correct information that we hold about you.

### **Right to Limit or Opt Out of Sales or Sharing**

You may be entitled to limit or opt out of sales and sharing of your personal information, either via the information offered above, or Do Not Sell or Share My Personal Information.

When submitting a request for information, correction, restriction or deletion, we will ask for additional information to verify your identity. If you submit a request through an authorized agent, Stride Forward Counseling may take steps to verify the agent's identity and confirm the agent's authority to act on your behalf, including requesting evidence of a power of attorney or other valid, written authority.

## **Deletion Request Rights**

In addition to the above, you or your authorized agents may have the right to request that the Company delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete and direct our service providers to delete your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. 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 the

information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 443-228-6741
- Written communication can be directed to Stride Forward Counseling LLC, Attn: Privacy Officer, 5740 Executive Dr, Ste 108, Catonsville MD 21228
- Email us at Admin@Strideforwardcounseling.com

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information related to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **Estimated Response Timing**

We endeavor to confirm receipt within five (5) business days and further respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 30 days (75 total)), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot

comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We are not required to search for personal information in every instance, including in the following situations:

- We do not maintain the personal information in a searchable or reasonably accessible format;
- We maintain the personal information solely for legal or compliance purposes;
- We do not sell the personal information and do not use it for any commercial purpose;
- As otherwise permitted by applicable law.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your Rights. Unless permitted by applicable law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA to CA residents (or as other applicable law may permit to other residents) that can result in different prices, rates, or quality levels. We currently do not offer any incentive program.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

## Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

- Calling us at 443-228-6741
- Written communication can be directed to Stride Forward Counseling LLC, Attn: Privacy Officer, 5740 Executive Dr, Ste 108, Catonsville MD 21228
- Email us at [admin@strideforwardcounseling.com](mailto:admin@strideforwardcounseling.com)