

Chaddock Behavioral Health Privacy Policy

PROCEDURE: The intent of this procedure is to outline FlexAMS's general guidelines and expectations for the collection, use, and disclosure of confidential information about individuals.

Website Privacy Policy

Chaddock Behavioral Health is a web-based service organization that provides a software solution, in person training, and other services (collectively, the "Services") to assist the documentation, reporting, and communication needs of agencies and companies providing support to people receiving long-term services and support.

Our Privacy Policy (the "Policy") describes the types of information we collect from you, how we share the information, and certain rights and options you have regarding your information. This Policy applies to information we collect from you through our website, attendance at one of our events or trainings, direct communications and inquiries, and otherwise. It does not apply to information that users collect or process through the Services.

Please review this Policy carefully before sharing information with us so you understand our privacy practices. By using our website, communicating with us, agreeing to have your agency or company use the Services, attending one of our events or trainings, or registering to receive information from us, you agree to the terms of this Policy.

Customer Data

As part of CBH's Services, our customers may load data into CBH servers. CBH will not share or distribute any such customer data except as provided in the contractual agreement between CBH and customer, or as may be required by law.

Collection of Personal Information

We may collect certain personal information in connection with your account or an employer's account with us, including name, business name, position, address, email address, and telephone number. We also collect information relating to your attendance at events/trainings, inquiries and communications received from you, and your agency or company's agreement to use the Services. We also collect personal information when you receive customer or technical support. The specific types of personal information we may process include:

- **Identity information** – first and last name, name of employer
- **Contact information** – physical address of your employer, email address at your employer, country, and business telephone number.
- **Employment information** – name of your employer and your position at the employer.

- **Training and event information** – details about trainings you have registered for or taken, events you have attended, and certifications you have achieved.
- **Financial data** – bank account number, wire information, and payment card details relating to your business or employer’s payment for its use of the Services.
- **Transactional data** – details about your company or employer’s agreement to purchase the Services and related services, including modules purchased, payments received, customer service-related inquiries and issues, and other information relating to your company or employer’s use of the Services.
- **Marketing and communications information** – information regarding any requests for information received from you, your marketing or communication preferences, and your responses to surveys we may provide to receive feedback regarding our services.
- **Usage information** – details regarding when and how you use our website and the Services.

Please note that we may aggregate or anonymize the foregoing types of data such that they are no longer capable of identifying you, in which case they are no longer considered “personal information.”

Other Information We Collect from You

Like most websites, we use the various technologies to automatically collect the following types of information about you:

IP Address or Device Identifier. When you visit our website, we collect your Internet Protocol (“IP”) address, which identifies the computer or service provider that you use to access our website or, if you connect through a mobile device, your mobile device identifier. We may use these identifiers to collect information about the length of time spent on our website or the specific areas visited.

Cookies. The Services uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app. These analytics and performance cookies are used only when you acknowledge our cookie banner and are used to view site traffic, activity, and other data and/or to provide you with a personalized experience. Cookies may also be used to keep track of your login name and password, to track your visits to the Site, to personalize your experience, and improve a Company Website so the pages you view and other behavior may be stored by cookies on your device. For further information about cookies, including how to refuse cookies, please visit www.allaboutcookies.org. You may still access the Online Services if you set your browser not to accept cookies.

Web Analysis tools. Our website may use web analysis tools to measure and collect anonymous session information. We use this information to monitor and analyze in a depersonalized form how users use the website and to maintain and improve the Website. We may also collect similar information from emails we may send to you, which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Website and Services.

The personal data collected when you visit the Services include:

- Information about your browser, network, and device
- Web pages you visited prior to coming to this website
- Search engine used to locate the Online Services
- Web pages you view while on this website and how long you use them
- Your IP address

The information collected through these technologies may be combined with personal information or aggregated with other information on website visits.

How We Use Your Information

The personal information uploaded by you will be shared only with authorized persons required to provide the Services. We may also use your depersonalized personal information to provide analyses of our users in the aggregate (including Analytical Data subject to the terms of this Privacy Policy) to prospective partners and other third parties.

We use the personal information we collect from you for the following purposes:

- To provide the services contracted for by your business or employer;
- To provide customer support services, and to verify, investigate, and respond to any claims, problems, or requests you may make relating to the Services;
- To provide you with information regarding, the Services, and events and trainings, as well as other information that you may request from us;
- To administer user profiles for your business or employer in our Services;
- To enforce our terms of service or agreement with your company or employer;
- To prevent or detect hacking activities, security breaches, or safety risks in connection with our website and the Services;
- To send service announcements and messages;
- To aggregate information to generate anonymous statistics regarding use of our website or Services;
- To develop, update, and improve our website, FlexAMS Services, and other services;

- To optimize your experience on our website and ensure that our content is presented to you in the most effective manner;
- To send you promotional or marketing communications and solicitations, track your marketing preferences, and for our internal marketing purposes;
- To notify you about changes to our website, including material changes to this Policy;
- To provide you with surveys or otherwise solicit feedback regarding the Services; and
- To perform other functions as otherwise described to you at the time of collection or that you otherwise consent to.

Disclosure of Your Information

When the information we collect is aggregated, anonymized, or otherwise does not identify you, we may use that information for any purpose or share it with third parties, to the extent permitted by applicable law.

We will not sell, rent, lease, or transfer your data to any third-party commercial entity for the purpose of marketing or selling unrelated products or services for our financial gain or economic benefit. We use your personal information to provide Services to you, deliver products and services, complete transactions, handle your questions or issues, and send communications to you about promotions, updates, or special offers that may be of interest to you. Other uses include verifying your identity, preventing fraud, and alerting you of new products, features, or enhancements to the Services. We may also use your email address to send you messages about your account or the Services, as well as other general announcements.

We reserve the right to disclose your information as necessary to comply with a subpoena or similar investigative demand, court order, request for cooperation from law enforcement or other governmental agency, to exercise our legal rights, to defend against legal claims, as otherwise required by law, or if you violate our Software Agreement.

By submitting personal information through the Services, you authorize CBH to share this personal use information for the purposes identified herein, and you grant us a royalty-free, worldwide, perpetual, irrevocable, and fully transferable right and license to use your personal information in connection with the creation and development of analytical and statistical analysis tools (the "Analytical Data"). We are expressly authorized to make any commercial use of the Analytical Data, including without limitation sharing the Analytical Data with third parties, provided that we do not sell, trade, or otherwise transfer from us any part of the Analytical Data that personally identifies any Users.

Feedback. You may choose to, or CBH may invite you to, submit comments, bug reports, ideas, or other feedback about the Services ("Feedback"). By submitting Feedback, you agree that CBH is free to use such Feedback at its discretion without any obligation to you. CBH may also choose to disclose Feedback to third parties. You hereby grant CBH a royalty-free, perpetual, irrevocable, transferable,

sublicensable, worldwide, nonexclusive license under all rights necessary to incorporate and use your Feedback for any purpose.

Asset Transfers. If we become involved in a merger, acquisition, or other transaction involving the sale of some or all of CBH's assets, User information may be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you through email and/or a prominent notice on the Site.

You can also choose not to provide us with certain information requested through our website, but that may result in you being unable to use certain features of our website, request information about products or services, or initiate other transactions with us.

Protection of Your Information

We use appropriate administrative, technical, and physical measures to protect your personal information from loss, theft, and unauthorized use, disclosure, or modification. Please be aware that no data transmission over the Internet is 100% secure. While we strive to protect your personal information, we cannot ensure or warranty the security of any information you transmit to us and you do so at your own risk. You are responsible for maintaining the confidentiality of the username and password for your FlexAMS website account portal.

Links to Third-Party Websites

Our website or Services may contain links to third-party websites. Such websites have separate privacy policies that you should review. We cannot take responsibility for the content of linked websites or those companies' data-handling practices.

Children's Privacy

Our website is a general audience site and is not directed at, or intended for use by, children under the age of 16 years. Accordingly, we do not knowingly collect personal information from children under age 16. Should we discover that a child under the appropriate age provided his or her personal information, we will use that information only to respond to that child and inform him or her that we must have parental consent before receiving such information.

Data Storage and Retention

We keep your personal information for as long as necessary to fulfill your requests or the purposes for which it was obtained. The criteria used to determine our retention periods include (i) for as long as we have an ongoing relationship with you, (ii) as required by a legal obligation to which we are subject, and (iii) as necessary to comply with legal obligations.

At the end of retention periods, your data will either be deleted completely or anonymized, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning

Changes to this Policy

Please note that we may change this Policy from time to time. If there are changes to our Policy, we will post them here and update the “Last Updated” date at the top of this document. Continued use of this website after any changes is deemed to be acceptance of those changes. Accordingly, we encourage you to check the Policy periodically for updates.

Payment

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express, and Discover.

Although no method of transmission over the Internet or electronic storage is 100% secure, Company follows all PCI-DSS requirements and implements additional generally accepted industry standards.

Third Party Privacy Policy

In general, the third-party providers used by us will only collect, use, and disclose your information to the extent necessary to allow them to perform the services they provide to us. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner your personal information will be handled by these providers.

Certain providers may be located in a different jurisdiction or have facilities that are located in a different jurisdiction than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website’s Terms of Service.

Information Safeguards

Website The personal information that you provide to us is stored on servers that are located in secure facilities with restricted access and protected by protocols and procedures designed to ensure the security of such information. We restrict access to only those CBH employees, independent contractors, and agents who need to know this information in order to develop, operate, and maintain the Services. All CBH personnel who have access to this information are trained in the maintenance and security of such information. However, no server, computer, or communications network or system, or data transmission over the Internet, can be guaranteed to be 100% secure. As a result, while

we strive to protect User information, we cannot ensure or warrant the security of any information you transmit to us or through the use of the Services and you acknowledge and agree that you provide such information and engage in such transmissions at your own risk.

In the event that personal information you provide to us is compromised as a result of a breach of security, when appropriate we will take reasonable steps to investigate the situation, notify you, and take the necessary steps to comply with any applicable laws and regulations.

FlexAMS Chaddock Behavioral Health's (CBH) policy is to maintain and operate a series of hosted virtual servers within the Microsoft Azure cloud. The purpose of these servers is to host the CBH application and supporting systems. All servers deployed for FlexAMS must be licensed by CBH through a contractual relationship between CBH and an authorized Microsoft Azure Partner. Approved server configuration guides must be established and maintained by CBH, based on business needs and approved by FlexAms. CBH will monitor configuration compliance. CBH has established a process for changing the configuration guides, which includes review and approval by administrative staff.

In general Flex staff will provide most configuration and maintenance and monitoring services with the involvement of authorized third-party vendors where indicated and needed. All third-party vendors will have a signed Business Associate Agreement and a Signed non-disclosure agreement with CBH.

Servers must be registered within the corporate enterprise management system currently hosted with Microsoft Azure Services

Mediation

You agree that in the event any dispute or claim arises out of or relating to this Privacy Policy, you and CBH will attempt in good faith to negotiate a written resolution of the matter directly between the parties. You agree that if the matter remains unresolved for forty-five (45) days after notification (via certified mail or personal delivery) that a dispute exists, all parties shall join in mediation services in the state of CBH's principle office with an arbitrator chosen by CBH in an attempt to resolve the dispute. Should you file any arbitration claims or any administrative or legal actions without first having attempted to resolve the matter by mediation, then you agree that you will not be entitled to recover attorneys' fees, even if you would otherwise be entitled to them.

GDPR and EEA Residents' Rights

The General Data Protection Regulation ("GDPR") is a privacy law that affords certain rights relating to the personal information of individuals in the European Economic Area ("EEA"). FlexAMS is not established in the EEA, does not target goods or services to individuals in the EEA, and does not monitor the behavior of individuals located in the EEA. Further, FlexAMS does not currently process personal information about individuals in the EEA. As a result, FlexAMS is not subject to the GDPR or privacy laws of countries in the EEA.

Your Right to Withdrawal Consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Right to Stop Direct Marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

This right does not include communications and information functions, such as alerts and notices, which are displayed in any application or product interface of ours which is part of the operation of or relates to a normal function of our product. By logging into our products or services, you are expressly giving your consent for such purposes. If you disagree with that then do not log in or use our products or services.

Checking Your Identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorized a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

How to Send Notice

You may send us notice of the exercise of your rights, whether to “opt-out” of certain or all marketing channels, to request deletion of your personal data or to correct, receive a copy of your personal data by any of the following means:

Send an Email to:

support@goflexams.com

Please include the action you are requesting we take, the basis for the action, and any information which can reasonably identify you, and valid means to respond back to you.