NOTICE OF PRIVACY POLICY AND PRACTICES

Coriander Living Collective LLC (CLC) is committed to protecting your privacy. This notice describes how CLC may use and disclose your personal information. Please review this carefully.

• CLC does not use or disclose your personal information for marketing purposes and does not sell your personal information.

• CLC will cooperate with the government and law enforcement officials and private parties to enforce and comply with the law. If during the course of services, a member of CLC suspects child or vulnerable adult abuse, or a serious threat to anyone's health or safety, or a school or national security threat, a report will be made.

• How your personal information is handled by CLC may vary depending on the services you access.

• To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, CLC has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect about our clients online and through other means.

Online

Please review this Notice of Privacy Policy & Practices (Notice) before using <u>www.corianderlivingcollective.com</u> or any linked social media or other sites. If you do not agree with this Notice, do not use these sites. By submitting any personal information to CLC's site, you agree to be bound by the terms of this Notice.

1. Information Collection and Use

We collect information about visitors to our Site so that we can provide an experience that is responsive to our users' and customers' needs. We do not collect medical information or credit card information through our Site. Our Site may use forms in which you give us contact information to request information or support. We receive and store any information you enter on our Sites, or give us in any other way, including through email, telephone, or other communications with safeguards. You do not need to give us any personal information in order to use our Sites.

 \cdot We will not sell, share, trade or otherwise use any information you provide unless you permit us to do so in writing.

• We will not sell, share, trade or otherwise use any medical information under any circumstances. If you require medical information, you must request it from us directly via a Request for Release of Information form.

We may also collect non-personally identifiable information about you, such as your use of our web sites, communication preferences, aggregated data relative to your Services, and responses to promotional offers and surveys. We may use or disclose aggregate information only where no individual is identified for a number of purposes, including: (a) Compiling aggregate statistics of usage for improving the web site; (b) Developing, maintaining and administering the web site; and (c) Following up on comments and other messages that you submit to us through the web site.

To better safeguard your information, please do not include any credit card information in your electronic communication unless it is specifically required by us as part of Services or transaction fulfillment process sites.

2. Security

Our Sites have security measures in place to protect against the loss, misuse or alteration of the information under our control. If our sites allow you to enter sensitive information such as a credit card number, they encrypt the transmission of that information using secure socket layer technology (SSL).

We may also at times provide information about you to third parties to provide various services on our behalf, such as providers who process credit card payments. We will only share information about you that is necessary for the third party to provide the requested service. These companies are prohibited from retaining, sharing, buying, selling, storing or using your personally identifiable information for any secondary purposes.

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet or cellular networks, or method of electronic storage can be guaranteed as 100% secure.

3. Squarespace, Google Analytics, and Cookies

CLC uses <u>www.squarespace.com</u> to host <u>www.corianderlivingcollective.com</u>. Squarespace's Privacy Notice can be found here: <u>https://www.squarespace.com/privacy</u>.

We may use a tool called Google Analytics to collect information about use of this Site, such as how often users visit the Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. Google Analytics collects only the IP address assigned to you on the date you visit this Site, rather than your name or other identifying information. We use the information received from Google Analytics only to improve services on this Site. Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Site. This cookie cannot be used by anyone but Google, Inc. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Privacy Policy <u>http://www.google.com/policies/privacy</u>. You can prevent Google Analytics from recognizing you on return visits to this Site by disabling the Google Analytics cookie on your browser.

4. Collection and Use of Personal Information of Children Under 13

We are committed to protecting the online privacy of children. In accordance with the Children's Online Privacy Protection Act ("COPPA"), we will not knowingly collect any personally identifiable information from children under the age of thirteen (13).

It is also our intention to adhere to the Children's Advertising Review Unit (CARU) Guidelines on Internet advertising with its special sensitivities regarding solicitations to children under thirteen (13). No part of our website is designed to attract anyone under the age of 13.

5. Transfer of Data Abroad

If you are visiting this Site from a country other than the country in which our servers are located, your communications with us may result in the transfer of information across international boundaries. By visiting this Site and communicating electronically with us, you consent to such transfers.

6. External Links

This Site and our Services may contain links to other websites. We are not responsible for the privacy practices or the content of such sites.

Psychotherapy & Counseling Clients

This Section describes how your Protected Health Information (PHI) can be used and disclosed, and your client rights to access and amend your information. Medical information is defined as all information that identifies you and relates to your past, present or future physical or mental health or condition including information about payment and billing for the health care services you receive.

CLC creates a record of care and services you receive. CLC uses the practice management software, SimplePractice. SimplePractice's privacy policy can be found here: <u>https://www.simplepractice.com/privacy/</u>. We need these records to provide you quality care and to comply with certain legal requirements. Health care providers who treat you from CLC including employees and volunteers and all members of CLC, other members of our workforce, and our business associates follow these standards.

We are required by law to:

- Make sure that PHI that identifies you is kept private.
- Give you notice of our legal duties and privacy practices with respect to health information.
- Notify you of any breach of your PHI which compromises your privacy within 30 days of learning of the breach.
- Follow the terms of the Notice that is currently in effect.
- We may change the terms of this Notice, and such changes will apply to all information we have about you. Any updated Notice will be available on www.corianderlivingcollective.com.

1. How We May Use and Disclose Protected Health Information About You

The following categories describe different ways that we use and disclose health information along with examples. Not every use or disclosure in a category will be listed:

• For treatment: We may use your medical information so that we and other health care providers may provide you with medical treatment or services. For example, coordination of your care with other providers.

• For Payment: We may disclose your medical information so that treatment and services you receive may be billed by us to a third party. For example, your health plan may need to know about treatment you received so they will pay us for the services provided or for a pre-authorization.

• For Healthcare Operations Purposes: We may use and disclose your medical information for our internal operations, such as business management, and administrative activities, legal and auditing functions, and insurance-related activities. For example, to evaluate the performance of those caring for you.

• Lawsuits and Disputes: If you are involved in a lawsuit, we may disclose health information in response to a court or administrative order. We may also disclose health information about your child in response to a subpoena, discovery request, or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.

• Individuals Involved in Your Care or Payment of Your Care: We may release your medical information to a friend or family member who is involved in your medical care, or to someone who helped pay for your care.

• Notification: We may release your medical information to notify a family member, personal representative or another person responsible for your care of your location, general condition, or death. We also may release your medical information for certain disaster relief purposes.

• Contacts: We may contact you to provide appointment reminders, information about treatment alternatives, or other health related benefits and services that may be of interest to you.

• Worker's Compensation: We may release medical information about you for worker's compensation or similar programs.

• Mental Health Information: State laws create specific requirements for the release of mental health records. We will obtain your specific authorization to release mental medical information when required by these laws.

• Miscellaneous: We may use or disclose your medical information without your prior authorization for several other reasons. Subject to certain requirements, we may give out your medical information without prior authorization for public health purposes, abuse or neglect reporting, health oversight audits or inspections, research studies, funeral arrangements, Coroner's investigations, organ donation, and emergencies. We also may disclose medical information when required by law in response to a request from law enforcement in specific circumstances, for specialized government functions including correctional, military or national security purposes, in response to valid judicial or administrative orders or to avoid a serious health threat.

• Other Disclosures: Other uses and disclosures not described above will be made only with your written authorization. You may revoke your authorization at any time unless we have relied on your authorization or your authorization was required as a condition of obtaining insurance coverage.

2. Certain Uses and Disclosures Require Your Authorization

• We do keep "psychotherapy notes" as that term is defined in 45 CFR § 164.501, and any use or disclosure of such notes requires your Authorization unless the use or disclosure is: a. For our use in treating you. b. For our use in training or supervising mental health practitioners to help them improve their skills in group, joint, family, or individual counseling or therapy. c. For our use in defending in legal proceedings instituted by you. d. For use by the Secretary of Health and Human Services to investigate my compliance with HIPAA. e. Required by law and the use or disclosure is limited to the requirements of such law. f. Required by law for certain health oversight activities pertaining to the originator of the psychotherapy notes. g. Required by a coroner who is performing duties authorized by law. h. Required to help avert a serious threat to the health and safety of others.

3. Certain Uses and Disclosures Do Not Require Your Authorization

Subject to certain limitations in the law, we can use and disclose your PHI without your authorization for the following reasons:

• When disclosure is required by state or federal law, and the use or disclosure complies with and is limited to the relevant requirements of such law.

• For public health activities, including reporting suspected child or vulnerable adult abuse, or preventing or reducing a serious threat to anyone's health or safety.

• For health oversight activities, including audits and investigations.

• For judicial and administrative proceedings, including responding to a court or administrative order, although our preference is to obtain an authorization from you before doing so.

· For law enforcement purposes, including reporting crimes occurring on our premises.

 \cdot $\,$ To coroners or medical examiners, when such individuals are performing duties authorized by law.

• For research purposes, including studying and comparing the mental health of patients who received one form of therapy versus those who received another form of therapy for the same condition.

• Specialized government functions, including, ensuring the proper execution of military missions; protecting the President of the United States; conducting intelligence or counter-intelligence operations; or, helping to ensure the safety of those working within or housed in correctional institutions.

• For workers' compensation purposes. Although our preference is to obtain an Authorization from you, we may provide your PHI in order to comply with workers' compensation laws.

• Appointment reminders and health related benefits or services. We may also use and disclose your PHI to tell you about treatment alternatives, or other health care services or benefits that we offer.

4. Certain Uses and Disclosures Require You to Have the Opportunity to Object

Disclosures to family, friends, or others. We may provide your PHI to a family member, friend, or other person that you indicate is involved in your care or the payment for your health care, unless you object in whole or in part. The opportunity to consent may be obtained retroactively in emergency situations.

5. You Have the Following Rights with Respect to Your PHI

• The Right to Request Limits on Uses and Disclosures of Your PHI. You have the right to ask us not to use or disclose certain PHI for treatment, payment, or health care operations

purposes. We are not required to agree to your request if we believe it would affect your health care.

• The Right to Request Restrictions for Out-of-Pocket Expenses Paid for In Full. You have the right to request restrictions on disclosures of your PHI to health plans for payment or health care operations purposes if the PHI pertains solely to a health care item or a health care service that you have paid for out-of-pocket in full.

• The Right to Choose How We Send PHI to You. You have the right to ask us to contact you in a specific way or to send mail to a different address, and we will agree to all reasonable requests.

• The Right to See and Get Copies of Your PHI. You have the right to get an electronic or paper copy of your medical record and other information we have about you. We will provide you with a copy of your record, or a summary of it, if you agree to receive a summary, within 30 days of receiving your written request, and we may charge a reasonable, cost based fee for doing so.

• The Right to Get a List of the Disclosures We Have Made. You have the right to request a list of instances in which we have disclosed your PHI for purposes other than treatment, payment, or health care operations, or for which you provided us with an authorization. We will respond to your request for an accounting of disclosures within 60 days of receiving your request. The list will include disclosures made in the last six years unless you request a shorter time. We will provide the list to you at no charge, but if you make more than one request in the same year, we will charge you a reasonable cost-based fee for each additional request.

• The Right to Correct or Update Your PHI. If you believe that there is a mistake in your PHI, or that a piece of important information is missing from your PHI, you have the right to request that we correct the existing information or add the missing information. We may say "no" to your request, but we will tell you why in writing within 60 days of receiving your request.

• The Right to Get a Paper or Electronic Copy of this Notice. You have the right to get a paper copy of this Notice, and you have the right to get a copy of this Notice by e-mail.

Workshop & Retreat Participants

Limited information, if any, is retained on workshop and retreat participants. Information collected and retained may include contact, payment, or consent information. All personal information about workshop & retreat participants will be handled with safeguards. Unless required by law, no information will be released without a written, signed Release of Information.

Changes

CLC reserves the right to modify this Notice at any time. If we decide to change our privacy policy or practices, we will post those changes to this Notice on

<u>www.corianderlivingcollective.com</u> and any other places we deem appropriate. The footer of this Notice lists the effective date and any revision dates.

If we make material changes to our privacy policy and practices, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

Complaints

If you believe your privacy has been violated or you disagree with a decision made concerning your personal information, please discuss this with your provider or contact, Cori Hildebrandt, MA, LPC WI, LPCC MN, HIPPA Security Officer at (651) 300-4939. You may also file a complaint with the Secretary of the U.S. Department of Health and Human Services at http://www.his.gov/ocr/privacy/hipaa/complaints/index.html or with any applicable State licensing board. You will not be penalized for filing a complaint in good faith.

Correcting, Updating, or Removing Personal Information

You may alter, update or deactivate your account information or opt out of receiving communications from us at any time. You may send an email to info@corianderlivingcollective.com or call (651) 300-4939.

We will respond to your request for access or to modify or deactivate your information within thirty (30) days.

Contact

For questions about this Notice of Privacy Policy and Practices, the practices of our website, or the services of Coriander Living Collective LLC please contact us here:

Coriander Living Collective LLC

info@corianderlivingcollective.com

P: (651) 300-4939

EFFECTIVE DATE OF THIS NOTICE: 7/26/2022

Acknowledgement of Receipt of Privacy Notice

Under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), you have certain rights regarding the use and disclosure of your protected health information. By checking the box below, you are acknowledging that you have received a copy of HIPAA Notice of Privacy Practices.