### Anchorpoint Counseling Ministry, Inc.

# Website Privacy Policy *Effective January 8, 2024*

Anchorpoint Counseling Ministry, Inc. ("us," "we," or "our"), the owner of <u>https://anchorpoint.org</u> (the "website" or "site"), is committed to protecting your privacy, personal information, and protected health information. By accessing and/or interacting with our website, you agree to the collection and use of limited information, as detailed below, in accordance with this policy.

This notice explains our privacy policies and practices relating to the information we collect, store, and transmit through our website. For ease of access and convenience, our Privacy Policy is publically available for review in the footer of the website at <u>https://anchorpoint.org</u>.

### 1. COLLECTION, STORAGE, AND USE OF INFORMATION

Anchorpoint Counseling Ministry collects information about users of this website to ensure the site is responsive to the needs of visitors. The information collected may include data related to the use of the website; communication preferences; and interactions with links, forms, and other functionalities.

The website includes online forms through which you can voluntarily submit personal data (name(s), address, phone, email, general needs, general interests) to receive information or provide support; express interest in our programs/services; and/or process online payments.

We may also collect data from you for the following purposes:

- To provide and maintain the website
- To notify you about changes to the website
- To allow you to participate in interactive features of the website at your sole discretion
- To provide customer support
- To gather analysis so that we can improve the website
- To monitor the usage of the website
- To detect, prevent, and address technical issues with the website
- To provide you with news, special offers, and general information about other goods, services, and events similar to those you have already purchased, engaged with, or inquired about (unless you have opted out of receiving this information)

However, you do not need to give us any personal information to use the website.

European Economic Area (EEA): Our legal basis for collecting and using personal information is dependent on the data we collect and the context in which we collect it. Your personal data may be processed for the following reasons:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights

- For payment processing purposes
- To comply with the law

We store all non-payment information collected and submitted through the website in secure databases operated by reputable third-party vendors requiring passwords and added layers of security, where possible (e.g., two-factor authentication). All payment information is independently processed and encrypted by PCI-compliant, third-party vendors. RESPONSES TO THE GENERAL CONTACT FORM ON THE WEBSITE (LOCATED UNDER "CONTACT": "GET IN TOUCH") ARE TRANSMITTED VIA EMAIL TO AN AUTHORIZED REPRESENTATIVE OF ANCHORPOINT COUNSELING MINISTRY FOR EASE OF TIMELY RESPONSE. PLEASE BE ADVISED: THERE ARE CERTAIN PRIVACY RISKS ASSOCIATED WITH EMAIL COMMUNICATIONS, SO YOU SHOULD NOT SUBMIT ANYTHING CONFIDENTIAL USING THE GENERAL "CONTACT FORM" ON THE WEBSITE.

We will only retain your personal data for as long as necessary and for the purposes defined in this Privacy Policy. We will not sell your information under any circumstance. We will not share your information with any other party without your express permission. We will not use your information for anything other than activities related to your engagement with Anchorpoint Counseling Ministry. You reserve the right to refuse future communications from us and/or remove yourself from any mailing lists at any time. Please use the contact information at the bottom of this Privacy Policy (see #10) to exercise this right.

Because of our contracts with third-party vendors and remote access needs by authorized representatives, your personal data may be transferred to and maintained on servers located outside of your jurisdiction where the data protection laws may differ from those in your own area. However, we will take all reasonable steps to ensure there are adequate security protocols and controls in place to protect your data and personal information.

The website may contain links to other web pages that are outside of our ownership, control, and administration. We cannot guarantee the privacy practices or content of these external web pages.

### 2. SECURITY

The website has security measures in place to protect against the loss, misuse, or alteration of the information under our control. We make reasonable efforts to keep all communications and data access secure through the website, such as implementing reasonable security measures, addressing known vulnerabilities in a reasonable and timely manner, and rigorously vetting third-party vendors. BY ENTERING AND SUBMITTING INFORMATION THROUGH THE WEBSITE, YOU ACKNOWLEDGE AND ACCEPT THAT WE HAVE NO CONTROL OVER THE UNAUTHORIZED ACCESS, INTERCEPTION, OR BREACH OF THESE COMMUNICATIONS OR DATA.

All payment information shared through the website is encrypted and securely processed by trustworthy, PCI-compliant, third-party vendors. All personal information shared through the website (e.g., names, contact information, etc.) is securely submitted and guarded behind

password protection and added layers of security, where possible (e.g., two-factor authentication).

We follow generally accepted standards to protect any personal information submitted to us through the website, both during transmission and upon receipt. However, no method of transmission via the Internet or electronic storage method is 100% secure. Therefore, we cannot guarantee the absolute security of this information in spite of our best efforts and intentions.

European Economic Area (EEA): You have certain data protection rights related to the information you share through the website, and we take reasonable steps to ensure these rights. Please contact us using the information below (see #10) to exercise these rights. Please note that we may ask you to verify your identity prior to responding to any such requests:

- The right to access, update, or delete your personal data
- The right to rectify data that is inaccurate or incomplete
- The right to object to our processing of your personal data
- The right to restrict the processing of your personal data
- The right to data portability so you know the extent of your personal data on record
- The right to withdraw consent to your personal data at any time

Our website server is located in the United States of America. If you are visiting the website from any other country, your communications with us through the site may result in the transfer of information across international boundaries. By visiting the website and communicating electronically with us, you consent to such transfers.

# 3. DISCLOSURE FOR LAW ENFORCEMENT AND LEGAL REQUIREMENTS

Under certain circumstances, we may be required to disclose your personal information if mandated by law or in response to valid requests by public authorities (e.g., a court or government agency). Further, we reserve the right to disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate for the following reasons. We may disclose your personal data in the good faith belief that such action is necessary to:

- comply with legal and ethical obligations
- protect and defend the rights or property of Anchorpoint Counseling Ministry or a third party
- prevent or investigate possible wrongdoing in connection with the website
- protect the personal safety of users of the website, the general public, or any person
- protect against legal liability

# 4. GOOGLE ANALYTICS AND COOKIES

Google Analytics is a web analytics tool offered by Google that helps website owners and administrators track and analyze site traffic. Google uses data collected from the website—such as frequency of visits to our site, pages visited, and other sites used prior to visiting our site—to track and monitor the use of the site. Google Analytics only collects the IP address assigned to you on the date you visit the website—not your name or other identifying information.

Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit the website. This cookie cannot be used by anyone other than Google, Inc. The information generated by the cookie will be transmitted to and stored by Google on servers in the United States. This data may be shared with other Google services. Google may use the data collected to develop a profile and personalize ads to you through its own advertising network.

We use the information received from Google Analytics to monitor traffic and improve services on the website. We do not combine information collected through Google Analytics with personally identifiable information.

Google's ability to use and share information collected by Google Analytics about your visits to the website is restricted and governed by Google's Privacy Policy available at <u>https://policies.google.com/privacy</u>. You can opt out of making your activity on the website available to Google Analytics by disabling the Google Analytics cookie on your web browser.

# 5. THIRD-PARTY ACCESS AND ONLINE PAYMENTS

We may employ third-party vendors to facilitate the website; provide the website on our behalf; perform website-related services; assist in analyzing the website usage; and/or administer storage of data collected via the website. Our third-party vendors—including web services, web security services, payment processors, database services, marketing services, and/or electronic health records services—are only permitted to use your personal data as necessary to perform their specific responsibilities. Our third-party vendors are strictly prohibited from retaining, sharing, buying, selling, storing, or using your personally identifiable information for any secondary purposes.

We may collect online payments for donations, services, events, and/or other purposes within the website. We use third-party payment processors who are PCI-compliant based on the standards put in place by the PCI Security Standards Council. These requirements help to ensure the secure handling of payment information using encryption and other strategies recommended by major payment brands, such as Visa, MasterCard, American Express, and Discover. Our third-party payment processors are governed by their own privacy policies:

- PayPal: https://www.paypal.com/us/legalhub/privacy-full
- Stripe: <u>https://stripe.com/privacy</u>
- Kindful: <u>https://kindful.com/privacy-policy/</u>

# 6. COLLECTION AND USE OF PERSONAL INFORMATION OF CHILDREN UNDER 14 YEARS OLD

As a youth- and family-serving organization, we are deeply committed to protecting the online privacy of children. We will not knowingly collect or store any personally identifiable information from children under 14 years old (i.e., the age of consent for healthcare services) without first obtaining consent from the child's parent or legal guardian. We will also not interact with or provide our services to a child under age 14 without a signed consent form from the child's parent or legal guardian may revoke consent at any time by contacting us using the information below (see #10). We are also sensitive to and intend to avoid advertising and/or soliciting in any way to children under the age of 14. We strongly

encourage parents/guardians to supervise and join their children in exploring the website and the Internet together.

### 7. CHANGES TO OUR PRIVACY POLICY

We reserve the right to update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on the website (linked and publically accessible in the footer). We will provide notice on the website, via email, or on this page to indicate any changes. We will also update the effective date of this policy. You are advised to review this Privacy Policy periodically for any changes. These changes are effective when they are posted to the website.

# 8. CORRECTING, UPDATING, REMOVING, AND OPTING OUT OF PERSONAL INFORMATION

You may change, update, or deactivate use of your personal information at any time. You also have the right to opt out of receiving communications from us at any time by contacting us using the information below (see #10).

## 9. MEDICAL INFORMATION

As a healthcare provider, we understand that your medical information is personal and we are committed to its protection in strict adherence with the provisions of the Health Insurance Portability and Accountability Act (HIPAA). You may request a copy of Anchorpoint Counseling Ministry's HIPAA Compliance Plan at any time by contacting us using the information below (see #10).

### **10. CONTACT INFORMATION**

Please contact us if you have any questions about this Privacy Policy; the website; your interactions with the website or our services; and/or our use of personal data and information:

Anchorpoint Counseling Ministry, Inc. 800 McKnight Park Dr, Ste 802 Pittsburgh, PA 15237 412-366-1300 acm@anchorpoint.org