

ASTRA BEHAVIORAL HEALTH, LLC

ONLINE PRIVACY POLICY

ASTRA BEHAVIORAL HEALTH, LLC operates the WWW.ASTRABH.COM website (the "Website"). This page informs you of our policies regarding the collection, use, and disclosure of Personally Identifiable Information, or "PII", when you use our Website and the choices you have associated with that PII, except for Protected Health Information (PHI) submitted by you in the course of using our Website, which is covered HIPAA and discussed in our HIPAA Policy. Any conflict between this Privacy Policy and the HIPAA Policy with respect to such submitted Personal Health Information shall be resolved in favor of the HIPAA Policy. Personally Identifiable Information, or PII, means any information that may be used to identify an individual, including, but not limited to, a first and last name, email address, a home, postal or other physical address, and phone number. By using the Website, you agree to the collection and use of information in accordance with this policy.

ASTRA BEHAVIORAL HEALTH, LLC does not sell or rent Personal Identifiable Information regarding our clients to any third party. Personal Identifiable Information is only collected when knowingly and voluntarily submitted by you. Your privacy is very important to us.

Article I. CATEGORIES OF INFORMATION WE COLLECT

Section 1.01 Information You Provide to Us - While using our Website, ASTRA BEHAVIORAL HEALTH, LLC may ask you to provide us with certain Personal Identifiable Information that can be used to contact or identify you, including, but not limited to: email address, first name and last name, phone number, and address.

Section 1.02 Usage Data - We may also collect information to better understand how the Website is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (i.e., IP address), browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Section 1.03 Location Data - We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Website, to improve and customize our Website. You can enable or disable location services when you use our Website at any time, through your device settings.

Section 1.04 Cookies Data - We use cookies and similar tracking technologies to track the activity on our Website and hold certain information. Cookies are pieces of information stored directly on the device you are using. Cookies we use do not contain or capture unencrypted Personal Identifiable Information. Cookies allow us to collect information such as browser type, time spent on the Website, pages visited, language preferences, and your relationship with us. We use the information for security purposes, to facilitate navigation and to display information more effectively

Article II. AREAS OF DATA COLLECTION

Section 2.01 ASTRA BEHAVIORAL HEALTH, LLC may collect your personal data throughout the following areas throughout your contact and relationship with us:

- (a) Contact or Other Form Entries
- (b) User Comments and Related PII
- (c) User Analytics
- (d) Website Chat
- (e) Call Tracking
- (f) Social Sharing

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Article III. USE AND DISCLOSURE OF INFORMATION WE COLLECT

Section 3.01 ASTRA BEHAVIORAL HEALTH, LLC may use the collected PII for various purposes:

- (a) To provide and maintain our Website.
- (b) To notify you about changes to our Website.
- (c) To allow you to participate in interactive features of our Website when you choose to do so.
- (d) To provide customer support, improvement of health status and patient experience.
- (e) To gather analysis or valuable information so that we can improve our Website.
- (f) To monitor the usage of our Website.
- (g) To provide you with information that you have requested or to respond to your inquiries.
- (h) To detect, prevent and address technical issues.

Section 3.02 ASTRA BEHAVIORAL HEALTH, LLC may also disclose PII for the following purposes:

- (a) **Disclosure for Law Enforcement:** Under certain circumstances, we may be required to disclose your Personal Identifiable Information if required to do so by law or in response to valid requests by public authorities (i.e., a court or a government agency).
- (b) **Legal Requirements:** We may disclose your PII in the good faith belief that such action is necessary: (1) to comply with a legal obligation; (2) to protect and defend our rights or property; (3) to prevent or investigate possible wrongdoing in connection with the Website; (4) to protect the personal safety of users of the Service or the public; or (5) to protect against legal liability.

Article IV. ANALYTICS

Section 4.01 ASTRA BEHAVIORAL HEALTH, LLC may use third-parties to monitor and analyze the use of our Website.

- (a) **Google Analytics:** Google Analytics is a web analytics service offered by Google Inc. (Google) that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Site. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: policies.google.com/privacy
- (b) **IP Address:** Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits our Website, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many websites. We use IP Addresses for purposes such as calculating usage levels, helping diagnose server problems, for compliance and security purposes.

Article V. HOW TO OPT-OUT OF COOKIES

Section 5.01 You can refuse to accept these cookies and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of our Website and some online services. Our Website may not load or display properly. To find out more about cookies, including how to see what cookies have been set and how to block and delete cookies, please visit <http://www.aboutcookies.org/>.

Section 5.02 ASTRA BEHAVIORAL HEALTH, LLC collects statistical information about the usage of our Website in order to continually improve the design and functionality, to monitor responses to our advertisements and content, to understand how visitors use our Website and to assist us with resolving questions regarding our Website.

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Article VI. WEBSITE USE BY MINORS

Section 6.01 ASTRA BEHAVIORAL HEALTH, LLC Website is not intended for children under the age of 18 without parental consent. ASTRA BEHAVIORAL HEALTH, LLC does not knowingly allow individuals under the age of 18 to provide us with Personal Identifiable Information. If you are under the age of 18 years of age, we must obtain valid and verifiable parental consent by your parent or legal guardian to this Privacy Policy and our Terms and Conditions before you can use or access our Website. If we determine the consent obtained is inadequate, we will notify you and you may not use or access the Website. However, if you are a parent or guardian of a minor, under the age of 18, you may, in compliance with the Terms and Conditions, use our services on behalf of such minor. Any information you provide us on behalf of your minor child will be treated in accordance with this Privacy Policy.

Article VII. YOUR RIGHTS REGARDING YOUR PERSONAL IDENTIFIABLE INFORMATION

Section 7.01 You have the right to request a copy and inspect your Personal Identifiable Information which you have provided to us.

Section 7.02 ASTRA BEHAVIORAL HEALTH, LLC may not be able to comply with a request where Personal Identifiable Information has been destroyed, erased or made anonymous in accordance with ASTRA BEHAVIORAL HEALTH, LLC's record retention obligations and practices. In the event that we cannot provide an individual with access to their own Personal Information, we will endeavor to provide the individual with an explanation, subject to any legal or regulatory restrictions.

Section 7.03 You have the right to request a restriction on the use or disclosure of your Personal Identifiable Information. You must request in writing and state the specific restriction requested and to whom you want the restriction to apply. However, we are not required to agree to a restriction that you have requested.

Section 7.04 You have the right to request deletion of your Personal Identifiable Information.

Section 7.05 You have a right to obtain a paper copy of this Privacy Policy. We have attached a link to a PDF version of this Privacy Policy located at the bottom of our Privacy Policy page on our Website.

Article VIII. SECURITY AND PROTECTION

Section 8.01 To protect Personal Information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings as well as oversight of our third-party service providers to ensure information remains confidential and secure. While we follow accepted industry standards to protect the Personal Information submitted to us (both during and once we receive it), no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

Article IX. REVISIONS TO OUR PRIVACY POLICY

Section 9.01 As additional features and functions are added, updates to this Privacy Policy may be necessary. ASTRA BEHAVIORAL HEALTH, LLC reserves the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Policy at any time. It is our policy to post changes made by us to our Privacy Policy on this page. The date this Privacy Policy was last revised can be located at the bottom of each page within the policy. You are responsible to periodically monitor and review updates made to our Privacy Policy, and any other policies, restrictions, conditions and notices each time you visit this Website. By accessing, browsing, and/or otherwise using the Website following the posting of changes, you accept and agree to be bound by those changes.

If you have any questions regarding security on our Website, you may e-mail or mail in questions to:

**Ombudsman
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Elizabethtown, KY 42702
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