



OPEN PATHS COUNSELING CENTER

OPEN PATHS COUNSELING CENTER website

Privacy Practices

This Privacy Statement describes the personal data we collect and/or process (which may include collecting, organizing, structuring, storing, using, or disclosing) to provide services offered directly by Open Paths Counseling Center, including Open Paths Counseling Center's website, inquiry form, emails, and phone/text communications. Open Paths Counseling Center services covered in this Privacy Statement do not include services received with Open Paths Counseling Center that are covered under a separate privacy policy (i.e. electronic health records). California residents, please see our California Privacy Notice at Collection, and California & Other U.S. State Privacy Rights sections.

What Personal Data Do We Receive?

Personal data is any information from or about an identified or identifiable person, including information that Open Paths Counseling Center can associate with an individual person. We may collect, or process on behalf of our clients, the following categories of personal data when you use or interact with Open Paths Counseling Center services:

- Prospective Client information: information provided by clients in order to identify clients for services which may include name, email address, phone number, age, services desired, location, languages spoken, and reasons for seeking services.

How Do We Use Personal Data?

Personal data covered by this policy is only ever used for contact purposes and connecting clients to services with Open Paths Counseling Center unless as required for legal, safety, or security reasons.

How Do We Share Personal Data?

Personal data covered by this policy is never shared with third parties except for the following:

- For treatment or payment reasons: You have provided written or verbal consent to share personal data with a referring party or a payor.
- For legal reasons: Open Paths Counseling Center may share personal data as needed for Mandated Reporting reasons and other reasons to comply with applicable law or respond to, investigate, or participate in valid legal process and proceedings, including law enforcement or government agencies.

Who Can See, Share, and Process My Personal Data When I Use Open Paths Counseling Center Services?



OPEN PATHS

COUNSELING CENTER

Only members of the intake and clinical staff and only as needed for communication and connecting to treatment services.

Privacy Rights and Choices

We do not participate in any marketing communications. For Data Rights, see the respective section below for California & Other U.S. State Privacy Rights.

Children

Open Paths Counseling Center does not allow children under the age of 12 years to sign up for services without parent consent. Minors 12-17 years may sign up for services if determined to be clinically eligible.

How to Contact Us

If you have any privacy-related questions or comments related to this privacy statement, please send an email to inquiry@openpaths.org

You can also contact us by writing to the following address:

Open Paths Counseling Center
301 N Prairie Ave, Ste 510
Inglewood, CA 90301

Retention

We retain personal data for as long as required to engage in the uses described in this Privacy Statement, unless a longer retention period is required by applicable law.

The criteria used to determine our retention periods included the following:

- The length of time we have an ongoing relationship with you and provide behavioral health services;
- Whether we have a legal obligation to keep the data (for example, certain laws require us to keep medical records for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to the enforcement of our agreements, the resolution of disputes, and applicable statutes of limitations, litigation, or regulatory investigation).

California & Other U.S. States Notice at Collection

Categories of Personal Information Open Paths Counseling Center Receives: Open Paths Counseling Center may collect, or process on behalf of clients/prospective clients, the following



OPEN PATHS

COUNSELING CENTER

categories of personal data, as described above in the “What Personal Data Do We Receive?”, section: prospective client information (such as information provided by clients in order to identify clients for services which may include name, email address, phone number, age, services desired, location, languages spoken, and reasons for seeking services).

Sources: We receive information from you (through completion of the inquiry form or via emails to inquiry@openpaths.org), from partner organizations and other referral sources.

Open Paths Counseling Center’s business and commercial purposes for use: Open Paths Counseling Center uses personal data for the following business and commercial purposes: to provide psychotherapeutic services; to communicate with you, partner organizations, and referral sources; and for legal reasons. For more information, please see How Do We Use Personal Data and How Do We Share Personal Data? Sections above.

Open Paths Counseling Center does not use your personal information for advertising or marketing purposes.

Retention: Open Paths Counseling Center retains personal data for as long as required to engage in the uses described in this Privacy Statement, unless a longer retention period is required by applicable law. Additional detail on retention criteria can be found under Retention, above.

California & Other U.S. State Privacy Rights

Under some U.S. state laws, including the California Consumer Privacy Act of 2018 (as amended by the California Consumer Privacy Rights Act) (CCPA), residents may have a right to:

- **Access** the categories and specific pieces of personal data Open Paths Counseling Center has collected, the categories of sources from which the personal data is collected, the business purpose(s) for collecting the personal data, and the categories of third parties with whom Open Paths Counseling Center has shared personal data, and obtain the personal data in a portable and, to the extent technically feasible, readily usable format;
- **Delete** personal data under certain circumstances;
- **Correct** personal data under certain circumstances; and
- **Opt out** of the “sale” of personal data or “sharing” of personal data for targeted advertising purposes. We do not sell your personal data ever or share personal data for targeted advertising purposes.



OPEN PATHS

COUNSELING CENTER

- **Appeal** a denial of your request. Some states provide additional rights to their residents. If we decline to process your request, you may have the right to appeal our decision. You can do so by replying directly to our denial or emailing inquiry@openpaths.org.

Open Paths Counseling Center will not discriminate against you for exercising any of these rights, which is further in line with your rights under state law.

Sensitive Information. Open Paths Counseling Center receives information that may be considered sensitive under some state laws, such as certain personal information. Open Paths Counseling Center processes sensitive personal information to provide psychotherapeutic services, to communicate with you, for legal reasons, and with your consent. Open Paths Counseling Center does not use or disclose sensitive personal information (as defined under CCPA) for purposes of inferring characteristics about a client/prospective client, or in any way that would require Open Paths Counseling Center to provide a right to limit under the CCPA. Under certain laws, residents may also be permitted to opt out of certain profiling relating to automated processing analyzing certain categories of an individual's information that would produce a legal or similarly significant effect. Open Paths Counseling Center does not engage in this type of profiling of individuals.

To exercise your rights, please email inquiry@openpaths.org.

We will acknowledge receipt of your request within 10 business days, and provide a substantive response within 45 calendar days, or inform you of the reason and extension period (up to a total of 90 days) in writing.

These rights are not absolute, are subject to exceptions and limitations, and may not be afforded to residents of all states. In certain cases, we may decline requests to exercise these rights where permitted by law. We will need to verify your identity to process your access, deletion, and correction requests and reserve the right to confirm your state residency. To verify your identity, we may require you to give a declaration as to your identity under penalty of perjury, and/or provide additional information, such as providing at least two pieces of personal information relating to your identity (which will be compared to information we have, such as profile information) or as we otherwise may already have in our possession, such as your date of birth and phone number. We will verify your request by comparing the information you provide to information already in our possession, and take additional steps to minimize the risk of fraud. You may designate an authorized agent to submit your verified request by providing written permission and verifying your identity, or through proof of power of attorney.



OPEN PATHS

COUNSELING CENTER

California's Shine the Light Law

Under California's Shine the Light law, you may also ask companies with whom you have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes and the categories of personal information disclosed. You may send us requests for this information to inquiry@openpaths.org. In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Changes to This Privacy Statement

We may update this Privacy Statement periodically to account for changes in our collection and/or processing of personal data, and will post the updated Privacy Statement on our website, with a "Last Updated" date at the top and an Update Note at the bottom. If we make material changes to this Privacy Statement, we will notify you and provide you an opportunity to review before you choose to continue using our products and services.