

# Privacy Policy

## 1. About Your Privacy and This Privacy Policy

Your privacy is extremely important to us. We are constantly putting a great deal of thought, effort, tools, resources and procedures in place in order to protect and safeguard your privacy. This document is our "Privacy Policy," and it contains details on issues related to your privacy when using our services. This Privacy Policy applies to visitors to the public websites owned and operated by WhysCounselor Family Therapy Services, Inc. (WhysCounselor), the registered users of WhysCounselor associated mobile and web application (collectively with the websites, the "Platform"), and to the counselors that provide the Counselor Services ("Counselors"). It is intended to inform you of our policies, procedures and practices regarding the collection, use and disclosure of any information that you provide through the Platform.

The Privacy Policy does not apply to the collection and use of certain employment-related information for employees of WhysCounselor Family Therapy Services, Inc. If you are a current or former WhysCounselor job applicant, employee, owner, director, officer, or contractor, please contact us at [info@whyscounselor.com](mailto:info@whyscounselor.com) for the appropriate notice.

If you are visiting our website as a California resident, your rights under the privacy laws applicable in your jurisdiction are represented in an addendum to this policy. If you do not see this addendum below, please contact us at [info@whyscounselor.com](mailto:info@whyscounselor.com) to receive the additional information describing your rights under these laws.

The Privacy Policy is part of our Terms and Conditions. The terms in the Privacy Policy (such as, but not limited to, "we", "our", "us", "Platform", and "Counselor Services") have the same meaning as in our Terms and Conditions document. When you use our Platform, you accept and agree to both the Terms and Conditions and to the Privacy Policy. If you do not agree to be bound to the Privacy Policy you should stop using the Platform immediately or cease to provide the Counselor Services, as applicable. By accessing and using our Platform or providing the Counselor Services, as applicable, you affirm that you have read the Terms and Conditions and the Privacy Policy and that you understand, agree to and acknowledge all the terms contained in both.

## 2. Information Collection, Use, and Disclosure

### Categories of Information Collected

To let us operate the Platform effectively and to let you use the Platform, including the Counselor Services, we may collect, use, and store the information described below. The information we collect is received directly or indirectly from you and generated during your use of the Platform. The data we collect is not used for marketing or any other purposes except as specified in this Privacy Policy.

*Visitor Data:* WhysCounselor collects, uses, and stores data regarding user visits to its website and use of the WhysCounselor application ("Visitor Data"), including the particular pages visited or viewed by the user, the amount of time the user spent on the website or application, website errors experienced by the user, visits to the WhysCounselor "FAQ" page, and information about the browser or device used to access the website and application, such

as the user's mobile device ID and IP address. These practices apply to users who visit pages for prospective new customers as well as those who visit pages for prospective Counselors.

*Onboarding Data:* In addition to the questionnaire responses provided by users (including Counselors) in the process of initial registration, WhysCounselor collects, uses, and stores certain additional data from users during the onboarding process ("Onboarding Data"). This data includes the pages viewed by the user, whether the user clicks the "Get started" link to begin completing the questionnaire, and whether the user responds to any of the questionnaire prompts.

*Account Registration Data:* WhysCounselor collects, uses, and stores certain information in connection with the account registration process, such as whether users registered using their Facebook or Google profiles, and whether a user verifies their reported email address or phone number ("Account Registration Data"). WhysCounselor also assigns each user (including Counselors) who creates a WhysCounselor account an anonymized, sequentially generated client ID.

*Transaction Data:* WhysCounselor collects, uses, and stores certain information regarding payment for its services by users and related transactions on its website, such as whether a user completed payment for WhysCounselor services, signed up for WhysCounselor services using a trial offer, canceled or otherwise ended a trial for WhysCounselor services ("Transaction Data").

*Login Data:* WhysCounselor collects, uses, and stores data regarding logins to WhysCounselor Platform by registered users (including Counselors) and activity conducted during that log in such as when a user logs in, the number of messages received or sent through WhysCounselor website or app during that log in, and whether a user has been assigned, started, or completed a counseling goal ("Login Data"). Login Data does not include the content of any messages sent or received by users or the content of any counseling goals.

*Counseling Session Data:* WhysCounselor collects, uses, and stores certain general data regarding user counseling sessions such as whether a live session has been scheduled by the user, whether a Counselor or user joins a scheduled session, when a counseling session began and ended, and whether a counseling session was canceled or re-scheduled.

*Customer Data:* WhysCounselor collects, uses, and stores certain data from users that have signed up for WhysCounselor services such as a user's self-reported name or nickname, age, e-mail address, phone number, and emergency contact information ("Customer Data").

*Counselor Data:* In order to identify, credential, re-credential, run checks, and pay Counselors, WhysCounselor collects, uses, and stores certain data from Counselors. This data includes information such as the Counselor's name, bank account information, governmental identification numbers, e-mail address, phone number, address, NPI number (if applicable), CAQH number (if applicable), and education and job history ("Counselor Data").

*Communications Data:* WhysCounselor collects, uses, and stores communications between users and Counselors on the Platform, and communications between users and WhysCounselor customer service team ("Communications Data").

Protecting this information is important for us. Other than in the ways detailed in this Privacy Policy, we will never use or disclose any information unless you requested or approved us to do so.

## **Purposes for Which Information Is Used**

We may use the information we collect for one or more of the following purposes:

### **Communication with you**

- To contact you or provide you with information, alerts and suggestions that are related to the Platform.
- To verify your identity.
- To complete an activity you requested, such as register for the Platform or obtain more information.
- To reach out to you, either ourselves or using the appropriate authorities, if we have a good reason to believe that you or any other person may be in danger or may be either the cause or the victim of a criminal act.

### **Delivery of services to you**

- To create your account on our Platform and let you log in to your account and use the Platform.
- To manage your account, provide you with customer support, and ensure you are receiving quality service.
- For billing and transaction processing purposes.
- To match users with Counselors and facilitate the Counselor Services.
- To provide, support, personalize, and develop our Platform and the Counselor Services.

### **Administration and improvement of services**

- To supervise, administer and monitor the Platform.
- To measure and improve the quality, effectiveness, and delivery of our services.

### **Customization**

- To personalize the website experience and to deliver content and product and service offerings relevant to individual interests, including targeted offers and ads.

### **Compliance with law**

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To comply with applicable state and federal laws, including, but not limited to laws related to protecting client and public health and safety.

### **Other uses with consent**

- Any other purpose with your consent.

### **Purposes for Which Information Is Disclosed to Third Parties**

Information about you may be disclosed to third parties for one or more of the following purposes:

*For business purposes:* Only as necessary for facilitating the Counselor Services, we may share a user's information with a Counselor and a Counselor's information with a user. We may also share your information with vendors and service providers, including our data hosting and data storage partners, analytics and vendors providing technology services and support, payment processing, and data security. We also may share information with professional advisers, such as auditors, law firms, and accounting firms. All are HIPAA Compliant & secure.

*With your direction or consent:* We may share your information with third parties if you request or direct us to do so.

*With affiliates within our corporate group:* We may share your information with any subsidiaries or parent companies within our corporate group.

*For advertising:* If you opt-in to the use of targeting cookies and web beacons, information regarding your activity on our websites, excluding activity when you are logged in and have started therapy, may be disclosed to our advertising partners to optimize marketing. We do not share with any advertising platform private information like member names, email addresses, phone numbers, diagnosis, sessions data, journal entries, messages, worksheets, or any other type of communication you have with your therapist.

*Compliance with law:* We may share your information with a court, a regulatory entity, law enforcement personnel, or pursuant to a subpoena, to comply with applicable law or any obligations thereunder.

*In the context of a transaction:* We may share your information in connection with an asset sale, merger, bankruptcy, or other business transaction.

*For other business reasons:* We may share your information to enforce any applicable Terms and Conditions and Terms of Use, and to ensure the safety and security of the Platform and our users.

Note that if you make any information publicly available on the Platform, anyone may see and use such information.

### **3. Opting out of Marketing Communication**

You can opt out of receiving email marketing by unsubscribing using the unsubscribe link provided in all our marketing email communications.

### **4. Cookies and Web Beacons**

Like many websites, we use "cookies" and "web beacons" (also known as pixels) to collect information. A "cookie" is a small data file that is transferred to your computer's hard disk for record-keeping purposes. We collect cookies that are necessary for the Platform to function, cookies that enhance the Platform's performance, and cookies used for third-party tracking. A "web beacon" is a tiny and sometimes invisible image or embedded code, placed on a Web page or email that can report your visit or use to a third party. Web beacons are typically used by third parties to monitor the activity of users at a website for the purpose of web analytics, advertising optimization, or page tagging. Additional information regarding web beacons is available on Wikipedia.

You can change your browser's settings so it will stop accepting cookies and web beacons or to prompt you before accepting a cookie or web beacon.

### **Use of Cookies, Web Beacons, and Similar Technology for Analytics**

We may use third party cookies or web beacons for the purposes of web analytics, attribution, and error management. Our Platform may use vendor services that use cookies, web beacons, and similar technology to collect and store anonymous information about you, including when you pay for services, load a page, indicate that you heard about us on television, sign up for services, enter your payment information (but the payment details are not disclosed), start the intake questionnaire, and your response as to the referral source to the Platform.

Our Platform also uses analytics vendors to collect information (for example, Visitor Data and Onboarding Data) about user actions on our websites for purposes of analytics and analysis of certain Platform usage.

### **Use of Cookies, Web Beacons, and Similar Technology for Advertising Networks**

If you opt-in to the use of targeting cookies and web beacons, you and others may see certain ads for our services or for the Platform on other websites because we participate in ad networks. Ad networks allow us to target our messaging to users through demographic, interest-based, and contextual means. These networks track individuals' online activities over time by collecting information through automated means, including using cookies, web server logs, and web beacons. The networks use this information to show advertisements that may be tailored to an individual's interests. The information our ad networks may collect includes information about your visits to websites that participate in the relevant ad networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our websites and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts and assists other websites and advertising partners to find you or people like you on different platforms, including social media websites.

## **5. Social and General Information Tools**

We use several publicly available tools and information exchange resources, such as (but not limited to) a blog, a Facebook page, a Twitter account, and Instagram account (collectively "Social and General Information Tools"). Any information you provide or share while using Social and General Information Tools may be read, accessed, collected by that site and users of that site according to their Privacy Policy.

## **6. Phishing**

Online identity theft and account hacking, including the practice currently known as "phishing", are of great concern. You should always be diligent when you are being asked for your account information and you must always make sure you do that in our secure system. We will never request your login information or your credit card information in any non-secure or unsolicited communication (email, phone or otherwise).

## **7. Links**

The Platform may contain links to other websites, services, or offers that are owned, operated, or maintained by third parties. If you click on a third-party link, you will be directed to that third website or service. The fact that we link to a website or service is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not have control over third-party websites and services, and we do not have control over their privacy policies and terms of use.

## **8. Security of Information**

While using any Internet-based service carries inherent security risks that cannot be 100% prevented, our systems, infrastructure, encryption technology, operation and processes are all designed, built, and maintained with your security and privacy in mind. We apply industry standards and best practices to prevent any unauthorized access, use, and disclosure. We comply with all applicable federal laws, state laws, and regulations regarding data privacy.

## **9. Service Providers**

We may employ third-party companies and individuals to facilitate our Platform, to perform certain tasks which are related to the Platform, or to provide audit, legal, operational, or other services for us. These tasks include, but are not limited to, customer service, technical maintenance, monitoring, email management and communication, database management, billing and payment processing, reporting and analytics. We will share with them only the minimum necessary information to perform their task for us and only after entering into appropriate confidentiality agreements.

## **10. Children's Privacy**

We do not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to become our user. The Platform is not directed and not intended to be used by children under the age of 18. If you are aware that we have collected Personal Information from a child under age 18 please let us know by contacting us and we will delete that information.

## **11. Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials to enforce and comply with the law. We may disclose information necessary or appropriate to protect the safety of the public or any person, to respond to claims and legal processes (including but not limited to

subpoenas), and to prevent or stop activity that may be illegal or dangerous. You should also be aware that Counselors may be obliged to disclose information to law enforcement or other authorities to conform to their professional and legal responsibilities. Specifically, and without limitation, you should be aware that the law requires mental health professionals to disclose information and/or act in the following cases: (a) reported or suspected abuse of a child or vulnerable adult; (b) serious suicidal potential; (c) threatened harm to another person; (d) court-ordered presentation of treatment.

## 12. Changes to the Privacy Policy

We may update this privacy statement at our sole discretion. The date of the last revision of this policy appears at the end of this page. We encourage you to periodically review this page for the latest information on our Privacy Policy and practices. Regardless of changes to our Privacy Policy, we will never use the information you submit under our current privacy notice in a new way without first notifying you and giving you the option to stop using the Platform.

## 13. Contacting us

If you have any questions or concerns about this Privacy Policy or our privacy-related practices, please contact us by clicking the "Contact" link at the bottom of any page in our website.

# Privacy Notice for California Residents

This **Privacy Notice for California Residents** supplements and is expressly made part of the information contained in the WhysCounselor Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"). Any terms defined in the CCPA have the same meaning when used in this Notice.

### 1. Information We Collect

Through your use of our website, we collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal information"). The description of the information that we collect is provided above, in the section titled "Categories of Information Collected." In particular, our websites have collected the following categories of personal information from consumers within the last twelve (12) months. Additionally, we have disclosed the following categories of information for a business purpose in the past twelve (12) months:

| <b>Category</b>   | <b>Collected</b> | <b>Disclosed for a business purpose</b> |
|---|------------------|---|
| A. Identifiers.   | Yes              | Yes                                     |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).                   | Yes              | Yes                                     |
| C. Protected classification characteristics under California or federal law.  | Yes              | Yes                                     |
| D. Commercial information.  | Yes              | Yes                                     |
| E. Biometric information.   | No               | No                                      |
| F. Internet or other similar network activity.  | Yes              | Yes                                     |
| G. Geolocation data.  | Yes              | Yes                                     |
| H. Sensory data.  | No               | No                                      |
| I. Professional or employment-related information.  | Yes              | Yes                                     |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | No               | No                                      |
| K. Inferences drawn from other personal information.  | Yes              | Yes                                     |

The information that we share with third parties is described in greater detail above in the section titled "Purposes for Which Information Is Disclosed to Third Parties."

WhysCounselor obtains the categories of personal information listed above from the following categories of sources:



- Directly from you. For example, from information you submit on the Platform during the process of using and paying for our Services.
- Indirectly from you. For example, from observing your actions on our websites or on an application provided by us.
- From third-party business partners such as social media sites, ad networks, and analytics providers.

## 2. Use of Personal Information

We may use the personal information we collect for one or more of the following business or marketing purposes:

| <b>Category of Personal Information</b>  | <b>Purpose of Use</b>  |
|--|--|
| Identifiers.   | We may use Identifiers (provided account name, email address, WhysCounselor online identifier, and IP address) to communicate with you, deliver our services to you, facilitate the Counselor Services, customize and market the services (attribution and optimization), conduct research and development and other activities to improve our service, understand how you interact with our services, and comply with the law.                    |
| Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | We use your name (if you provide it to us) and the payment details you provide to us to communicate with you, deliver services to you, and facilitate the Counselor Services.  |
| Protected classification characteristics under California or federal law.  | We may use your age, religion, sex, orientation and medical condition to customize and deliver the services to you. If you are a veteran or have military status, we may use this information to offer you a discount for our services.<br><br>We may also use this information to conduct research and development and other activities to improve our service, show and optimize advertising, and understand how you interact with our services. |

| <b>Category of Personal Information</b>           | <b>Purpose of Use</b>   |
|---|---|
| Commercial information.                           | We use information regarding your purchase of our services to customize and market services, conduct research and development and other activities to improve our services, show and optimize advertising, and understand how you interact with our services.                                 |
| Internet or other similar network activity.       | We use information regarding your activity on our websites to deliver our services to you, customize and market services (attribution and optimization), conduct research and development and other activities to improve our service, and understand how you interact with our services.     |
| Geolocation data.                                 | We use your geolocation information to personalize the services to you and for analytics.   |
| Inferences drawn from other personal information. | We use information regarding your actions on our websites and the information you provide to deliver our services to you, customize and market the services, conduct research and development and other activities to improve our service, and understand how you interact with our services. |

### 3. Disclosure of Personal Information

In the 12 months preceding the date of this Privacy Policy, WhysCounselor has shared personal information with the following categories of third parties:

| <b>Category of Personal Information</b> | <b>Purpose of Use</b>  |
|---|--|
| Identifiers.                            | We may disclose your IP address, advertising ID, or sequentially generated user ID unique identifier to our analytics vendors for analytics and to ad network partners for advertising optimization and attribution. |

| Category of Personal Information  | Purpose of Use   |
|---|--|
|   | <p>We may disclose your contact information to webinar providers and to customer support to provide services for the Platform.</p> <p>We may disclose contact information between users and Counselors to provide the Counselor Services. We may disclose your credit card information to payment processing vendors for payment processing.</p> <p>If you are a user that uses WhysCounselor as the result of a business arrangement WhysCounselor has with an organization you are affiliated with or with your employer, we may disclose, with your authorization, identifiers to those entities in order to deliver the services to you.</p> |
| <p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p> | <p>We may disclose your contact information to webinar providers and to customer support and payment processing vendors to provide services for the Platform and to ad network partners for advertising optimization and attribution.</p> <p>We may disclose personal information between users and Counselors as necessary to provide the Counselor Services.</p> <p>We may disclose your credit card information to payment processing vendors for payment processing.</p>   |
| <p>Protected classification characteristics under California or federal law.</p>  | <p>We may disclose information regarding your age, sex, race, gender, sexual orientation, medical conditions, and disabilities to our Counselors as necessary to provide the Counselor Services. Due to the use of cookies and web beacons, information regarding your activity on our websites, excluding activity when you are logged in and have started counseling, may be disclosed to our advertising partners to optimize marketing.</p>  |

| Category of Personal Information                  | Purpose of Use  |
|---|---|
| Commercial information.                           | <p>We may disclose information regarding your purchase of our services to our advertising partners to optimize marketing.</p> <p>We may disclose your credit card information to payment processing vendors for payment processing.</p>   |
| Internet or other similar network activity.       | <p>Due to the use of cookies and web beacons, information regarding your activity on our websites, excluding activity when you are logged in and have started counseling, may be disclosed to our advertising partners to optimize marketing.</p>   |
| Geolocation data.                                 | <p>We may disclose geolocation data to our advertising partners to optimize marketing.</p>  |
| Inferences drawn from other personal information. | <p>Due to the use of cookies and web beacons, information regarding your activity on our websites, excluding activity when you are logged in and have started counseling, may be disclosed to our advertising partners to optimize marketing.</p>   |
| All data categories                               | <p>We may disclose all necessary information about you to comply with legal requirements that apply to us.</p> <p>We may disclose information about you at your direction or request.</p> <p>We may disclose information about you to vendors and other contractors and advisors that provide services to us, including data hosting and storage providers, analytics providers, engineering vendors, data security vendors, marketing services processors, lawyers, advisors, auditors, accountants, and others.</p> <p>We may disclose information about you in connection with an asset sale, merger, bankruptcy, or other business transaction.</p> |

**Category of Personal Information****Purpose of Use**

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We may disclose information about you with corporate affiliates as necessary for internal business operations, and with subcontractors as necessary in the provision of services to you.

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The CCPA defines "sale" broadly. It includes the sharing of personal information in exchange for anything of value. According to this broad definition, in the 12 months before this section was last updated, our use of analytics and targeting cookies and web beacons to deliver advertising tailored to individual interests may have been considered a "sale" of personal information.

**4. Changes in Use of Personal Information in the Preceding Twelve Months**

Before April 2021, we may have used hashed contact details, which can be categorized as identifiers or personal information categories listed in the California Customer Records statute, to optimize our marketing to prospective users and Counselors.

**5. Changes to Disclosure of Personal Information in the Preceding Twelve Months**

Prior to April 2021, advertising network partners may have received your hashed contact details for advertising optimization and attribution. Additionally, protected classifications, as described above, may have been shared with advertising partners to optimize marketing.

**6. Your Rights and Choices**

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

**Right to Request Access to Information**

You have the right to request that WhysCounselor disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Your Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we shared that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose and identifying the personal information categories that each category of recipient obtained.

## Right to Request Deletion of Information

You have the right to request that WhysCounselor delete any of your personal information that we collected about you and retained, subject to certain exceptions. Once we receive your request and verify who you are, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We may also deny your request if the information in question is not subject to the CCPA. Examples of such information include de-identified information, information covered by the Health Insurance Portability and Accountability Act, and information covered by the California Confidentiality of Medical Information Act.

## Right to opt out of sale

You have the option to opt out of the use or disclosure of your information that is considered a "sale" under the CCPA. If you would like to opt out of the use and disclosure of your information, contact us at [info@whyscounselor.com](mailto:info@whyscounselor.com) to manage your preferences.

## Exercising Your Rights

To exercise the rights listed above, please submit a request in writing to WhysCounselor using [info@whyscounselor.com](mailto:info@whyscounselor.com) via email. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child.

You may only make a request for access twice within a 12-month period. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a request does not require you to create an account with us. We will only use personal information provided in a request to verify your identity or authority to make the request.

You may submit requests using the following methods:

By completing this form in writing and sending it to:

[info@whyscounselor.com](mailto:info@whyscounselor.com)

By calling our number: (909) 913-4733

### **Response Timing and Format**

We endeavor to respond to a request within forty-five (45) days of its receipt. If we require more time (up to 90 days from the day of receipt), we will inform you of the reason and extension period in writing.

For Requests to Access, our response will only cover the 12-month period preceding the request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **7. Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. We will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **8. Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [DPO@WhysCounselor.com](mailto:DPO@WhysCounselor.com).

## **9. Changes to Our Privacy Notice**

WhysCounselor reserves the right to amend this Privacy Notice at our discretion and at any time. When we make any changes to this Privacy Notice, we will post the updated Privacy Notice on our websites and update the Privacy Notice's effective date. Regardless of changes to our Privacy Policy, we will never use the information you submit under our current privacy notice in a new way without first notifying you and giving you the option to stop using the Platform. Your continued use of our websites and services following the posting of changes constitutes your acceptance of such changes.

## **10. Contact Information**

If you have any questions or comments about this Privacy Notice, the ways in which WhysCounselor collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

WhysCounselor  
[info@whyscounselor.com](mailto:info@whyscounselor.com)

Last Updated and Effective: April 9, 2022