



PRIVACY POLICY

Last updated March 5, 2024

This privacy policy for Outcomes Excellence, Inc. ("**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your information when you use our services ("**Services**"), such as when you:

- Visit our website at www.OutcomesExcellence.org or any website of ours that links to this privacy policy.
- Download and use our application(s), such as our mobile application "Wholistic Health" or any other application of ours that links to this privacy policy.
- Engage with us in other related ways — including any sales, marketing, seminars, or events.

Questions or concerns? Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@OutcomesExcellence.org.



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1. INFORMATION COLLECTED

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Name
- Email Address
- Demographics

Sensitive Information

When necessary, with your consent or as otherwise permitted by applicable law, we process sensitive information that you may provide through the Wholistic Health Program, Wholistic Health Assessment, or other Services.

Payment Data

We may collect data necessary to process your payment if you make purchases, such as your address or email. All payment data is stored by PayPal. You may find their privacy notice link(s) here: <https://www.paypal.com/us/legalhub/privacy-full>.

Application Data

If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:



- *Geolocation Information.* We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's bluetooth, calendar, camera, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- *Mobile Device Data.* We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.
- *Push Notifications.* We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

Social Media Login Data

We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter, or other social media account. If you choose to register in this way, we will collect the information described in the section called [Social Logins](#).



Information Automatically Collected

In Short: *Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our [Cookie Notice](#).

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used,



this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

- *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information Collected from Other Sources

In Short: We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g., Facebook or Twitter), we receive personal information about you such as your name, email address, and gender. Any personal information that we



collect from your social media account depends on your social media account's privacy settings.

Categories of Personal Information Collected

We may collect the following categories of personal information depending on the Services you request or interact with:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under state or federal law	Gender and date of birth	YES
D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO



E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
G. Geolocation data	Device location	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
J. Education information	Student records and directory information	NO
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO



L. Sensitive personal information	Account login information, drivers' licenses, health data, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, and sex life or sexual orientation	YES
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2. HOW INFORMATION IS PROCESSED

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.



- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see [Privacy Rights](#).
- **To deliver targeted advertising to you.** We may process your information to develop and display personalized content and advertising tailored to your interests, location, and more. For more information see our [Cookie Notice](#).
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. LEGAL BASES FOR PROCESSING INFORMATION

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason to do so under applicable law. For example, receiving your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.



Located in the EU or UK

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time by emailing info@OutcomesExcellence.org.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services
 - Develop and display personalized and relevant advertising content for our users
 - Analyze how our Services are used so we can improve them to engage and retain users
 - Support our marketing activities
 - Diagnose problems and/or prevent fraudulent activities
 - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement



body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In legal terms, we are generally the “data controller” under European data protection laws of the personal information described in this privacy policy, since we determine the means and/or purposes of the data processing we perform. This privacy policy does not apply to the personal information we process as a “data processor” on behalf of our customers. In those situations, the customer that we provide services to and with whom we have entered into a data processing agreement is the “data controller” responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

Located in Canada

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time by emailing info@OutcomesExcellence.org

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention



- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

4. HOW INFORMATION IS SHARED

In Short: *We may share information in specific situations described in this section and/or with the following categories of third parties.*

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with



any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services
- Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- Finance & Accounting Tools
- Government Entities
- Order Fulfillment Service Providers
- Payment Processors
- Performance Monitoring Tools
- Product Engineering & Design Tools
- Retargeting Platforms
- Sales & Marketing Tools
- Social Networks
- Testing Tools
- User Account Registration & Authentication Services
- Website Hosting Service Providers
- Ad Networks
- Affiliate Marketing Programs

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.



- **When we use Google Analytics.** We may share your information with Google Analytics to track and analyze the use of the Services. To opt out of being tracked by Google Analytics across the Services, visit <https://tools.google.com/dlpage/gaoptout>. You can opt out of Google Analytics Advertising Features through [Ads Settings](#) and Ad Settings for mobile apps. For more information on the privacy practices of Google, please visit the [Google Privacy & Terms page](#).
- **When we use Google Maps Platform APIs.** We may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Places API). We use certain Google Maps Platform APIs to retrieve certain information when you make location-specific requests. A full list of what we use information for can be found in the section titled "[HOW INFORMATION IS PROCESSED](#)". The Google Maps Platform APIs that we use store and access cookies and other information on your devices. If you are a user currently in the European Economic Area (EU countries, Iceland, Liechtenstein and Norway) or the United Kingdom, please take a look at our [Cookie Notice](#).
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include applicable parent companies and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.
- **Other Users.** When you share personal information (for example, by posting comments, contributions, or other content to the Services) or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside the Services in perpetuity. If you interact with other users of our Services and register for our Services through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.



5. THIRD-PARTY WEBSITES

In Short: *We are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Services, but are not affiliated with our Services.*

Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

6. COOKIES AND OTHER TRACKING TECHNOLOGIES

In Short: *We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.



Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

7. SOCIAL LOGINS

In Short: *If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.*

Our Services offer you the ability to register and log in using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.



8. TRANSFERRING INFORMATION INTERNATIONALLY

In Short: We may transfer, store, and process your information in countries other than your own.

We use secure third-party services for our servers which are located in the United States of America. If you are accessing our Services from outside the U.S. please be aware that your information may be transferred to, stored, and processed by us in these facilities and by those third parties with whom we may share your personal information (see "[HOW INFORMATION IS SHARED](#)").

If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have as comprehensive data protection laws or other similar laws. However, we take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

9. INFORMATION RETENTION

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.



10. INFORMATION SAFETY

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

11. INFORMATION FROM MINORS

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to ensure consent or promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at info@OutcomesExcellence.org.

12. PRIVACY RIGHTS



In Short: *In some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us at info@OutcomesExcellence.org. We will consider and act upon any request in accordance with applicable data protection laws.

Withdrawing Your Consent

If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent by contacting us at info@OutcomesExcellence.org. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting Out of Marketing and Promotional Communications

You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying “STOP” or “UNSUBSCRIBE” to the SMS messages that we send, or by contacting us at info@OutcomesExcellence.org. You



will then be removed from the marketing lists, however, we may still communicate with you, for example to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

14. UNITED STATES RESIDENTS

In Short: *If you are a resident of California, Colorado, Connecticut, Utah, or Virginia, you are granted specific rights regarding access to your personal information.*

California Residents

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are



a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

CCPA Privacy Notice

This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below. The California Code of Regulations defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents." If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

Your rights with respect to your personal data

Right to request deletion of the data – Request to delete



You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech. Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell or share your personal information to third parties;
- the categories of personal information that we sold, shared, or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, sharing, or selling personal information; and
- the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Right to Limit Use and Disclosure of Sensitive Personal Information

We may collect sensitive information, for example through the Wholistic Health Assessment ©. This information could include racial or ethnic origin, religious beliefs, health data, and other information. You have the right to limit the collection of this information by opting out or



skipping these questions. If you consented to and provided sensitive information in a non-anonymous method, you have the right to revoke consent. Once we receive your request, we will no longer process your sensitive information for any purpose unless you provide consent again. Please note that sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is not covered by this right, as well as the publicly available information. To exercise your right to limit use of sensitive personal information, please email info@OutcomesExcellence.org.

Verification Process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate. If we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additional information as soon as we finish the verification process.

Other privacy rights

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof



that they have been validly authorized to act on your behalf in accordance with the CCPA.

To exercise your right please email info@OutcomesExcellence.org.

Financial Incentives

"Financial incentive" means a program, benefit, or other offering, including payments to consumers as compensation, for the disclosure, deletion, sharing, or sale of personal information.

The law permits financial incentives or a price or service difference if it is reasonably related to the value of the consumer's data. A business must be able to explain how the financial incentive or price or service difference is reasonably related to the value of the consumer's data. The explanation must include:

- a good-faith estimate of the value of the consumer's data that forms the basis for offering the financial incentive or price or service difference; and
- a description of the method the business used to calculate the value of the consumer's data.

We may decide to offer a financial incentive (e.g., price or service difference) in exchange for the collection, retention, sale, or sharing of a consumer's personal information.

If we decide to offer a financial incentive, we will notify you of such financial incentive and explain the price difference, as well as material terms of the financial incentive or price of service difference, including the categories of personal information that are implicated by the financial incentive or price or service difference.



If you choose to participate in the financial incentive, you can withdraw from the financial incentive prior to receiving the financial incentive by emailing info@OutcomesExcellence.org.

Colorado Residents

This section applies only to Colorado residents. Under the Colorado Privacy Act (CPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects (“profiling”)

To exercise your right please email info@OutcomesExcellence.org. If we decline to take action regarding your request and you wish to appeal our decision, please email us at info@OutcomesExcellence.org. Within forty-five (45) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Connecticut Residents

This section applies only to Connecticut residents. Under the Connecticut Data Privacy Act (CTDPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.



- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects (“profiling”)

To exercise your right please email info@OutcomesExcellence.org. If we decline to take action regarding your request and you wish to appeal our decision, please email us at info@OutcomesExcellence.org. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Utah Residents

This section applies only to Utah residents. Under the Utah Consumer Privacy Act (UCPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising or the sale of personal data

To exercise your right please email info@OutcomesExcellence.org.



Virginia Residents

Under the Virginia Consumer Data Protection Act (VCDPA):

"Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

"Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

"Sale of personal data" means the exchange of personal data for monetary consideration.

If this definition of "consumer" applies to you, we must adhere to certain rights and obligations regarding your personal data.

Your rights with respect to your personal data

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Exercise your rights provided under the Virginia VCDPA

You can exercise your right by disabling cookies in your Cookie Preference Settings. You may also contact us by email at info@OutcomesExcellence.org. If you are using an authorized agent



to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Verification Process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

Right to Appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us at info@OutcomesExcellence.org. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

15. PRIVACY RIGHTS OF OTHER REGIONS

In Short: *You may have additional rights based on the country you reside in.*

Australia and New Zealand

We collect and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).



This privacy policy satisfies the notice requirements defined in both Privacy Acts, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular:

- offer you the products or services that you want
- manage your account with us
- respond to or help with your requests
- confirm your identity and protect your account

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "[Review, Updates, or Delete Data](#)".

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the [Office of the Australian Information Commissioner](#) and for a breach of New Zealand's Privacy Principles to the [Office of New Zealand Privacy Commissioner](#).

Republic of South Africa

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "[Review, Update, or Delete Data](#)".



If you are unsatisfied with the manner in which we address any complaint with regard to our processing of personal information, you can contact the office of the regulator, the details of which are:

[The Information Regulator \(South Africa\)](#)

General enquiries: enquiries@infoeregulator.org.za

Complaints (complete POPIA/PAIA form 5): PAIAComplaints@infoeregulator.org.za & POPIAComplaints@infoeregulator.org.za

16. RESEARCH CONSENT AND PRIVACY

***In short:** Privacy and consent for research is handled as outlined in this privacy policy.*

Research Purpose.

The Wholistic Health Assessment © is used to help improve individuals' quality of life by examining correlations between social determinants of health and health outcomes to better understand factors that impact quality of life.

Eligibility.

You must be of legal adult age to participate. If you are not, you must first receive the written consent of your parent or guardian prior to completing the assessment and/or be a client of a clinical professional who has instructed you to complete the assessment.

Procedures.

The assessment includes questions about your demographics such as age, trauma you experienced, coping mechanisms you prefer, your mental, physical, and spiritual health, and outlook on life. This assessment is voluntary. You can choose not to complete or submit the assessment at any time.



Confidentiality.

Your assessment results and participation are strictly confidential. The information is safeguarded, and in a password protected account on Microsoft Forms. Microsoft Forms is HIPAA compliant and participant answers are deleted from the collector website periodically. Only you, anyone you give access to, and Outcomes Excellence, Inc. researchers have access to assessment information. Information is stored on a password protected and secure device. Information may be included in an unidentifiable dataset to visualize group trends. If you are given a report of your own results, you are responsible for safeguarding the information on the report.

Potential Risks.

Although the questions are general in nature, we recognize that providing information about a traumatic experience may trigger unpleasant memories or emotions. While answering the questions, please prioritize your own safety and wellbeing. The information is important, but your wellbeing is of greater importance.

Potential Benefits.

This research identifies key factors that are correlated with quality of life which can help individuals and mental health providers make more informed health decisions.

Contact.

If you have any questions or concerns regarding the assessment, you may contact research@outcomesexcellence.org.

Consent.

By completing the assessment, it means you understand the information above, agree with the statements below, and give consent to have your unidentifiable answers analyzed to determine trends and solutions that can improve mental health programs and quality of lives.



17. UPDATES TO PRIVACY POLICY

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a policy of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

18. CONTACTING US

If you have further questions or comments about this privacy policy, you may contact info@OutcomesExcellence.org.

18. REVIEW, UPDATE, OR DELETE DATA

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please email info@OutcomesExcellence.org.