



**Unlock Counseling PLLC**  
**848 Dodge Ave #224, Evanston, IL 60202**  
**224-204-4101**

## **TECHNOLOGY PRIVACY PRACTICES**

Original: 01/01/2022

Updated: 01/18/2024

UNLOCK COUNSELING, and its affiliated entities (collectively, the “Companies,” “we” or “us”) respect and are committed to protecting your privacy. Generally, you can browse through our Website without giving us any information about yourself. When we do need to collect your PII (defined below) to provide you with the Service, or when you choose to provide us with your PII, this Privacy Policy describes how we collect, use and disclose your PII, except for personal health information submitted by you in the course of using our Service. Any conflict between this Privacy Policy and the HIPAA Policy with respect to such submitted personal health information shall be resolved in favor of the HIPAA Policy. Also, please note that, unless we define a term in this Privacy Policy, all capitalized terms used in this Privacy Policy have the same meanings as in our Terms of Service. Therefore, please make sure that you have read and understand our Terms of Service.

### **Changes to this Privacy Policy**

Any information that is collected via our Website, App or the Service is covered by the Privacy Policy or the HIPAA Policy in effect at the time such information is collected. We may amend this Privacy Policy from time to time. If we make any substantial changes in the way we use your PII, we will notify you of those changes by posting on the Service and Website or by sending you an email or other notification, and we will update the “Updated Date” above to indicate when those changes will become effective.

### **Information Collection**

Personally identifiable Information (“PII”) means any information that may be used to identify an individual, including, but not limited to, a first and last name, email address, a home, postal or other physical address, and phone number.

- **Account Information:** We collect your PII when you register with Unlock Counseling for access to your client portal or upon intake. If you create an account through the Website, we may also collect your title, birth date, gender, occupation, industry, personal interests, and other information that is not considered PII because it cannot be used by itself to identify you.
- **Cookies and Tracking Technology:** A “cookie” is a small data file that certain websites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the website uses to track the pages you’ve visited, but the only PII a cookie can contain is information you supply yourself. A cookie can’t read data off your hard disk or read cookie files created by other websites. Some parts of the Service use cookies to understand user traffic patterns and to tell us how and when you interact with our Website and Service. We do this in order to determine the usefulness of our Website and Service information to our users, to see how effective our navigational structure is in helping users reach that information and to customize and improve our Website and Service. Unlike persistent cookies, session cookies are deleted when you log off from the Website, App and Service and close your browser.
  - If you prefer not to receive cookies while browsing our Website and Service, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser. You do not need to have cookies turned on to use/navigate through many parts of our Website and Service, although if you do so, you may not be able to access all portions or features of the Website and Service. Some third-party services providers that we engage (including third-party advertisers) may also place their own cookies on your hard drive. Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by such third parties.

- “Web Beacons” (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Website, App and Service for several purposes, including to deliver or communicate with cookies, to track and measure the performance of our Website and Service, to monitor how many visitors view our Website and Service, and to monitor the effectiveness of our advertising. Unlike cookies, which are stored on the 3 3041753v.1 user’s hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).
- Information Related to Your Use of the Service: If you have not created an account, when you use our Service, you use our Service and Website anonymously. We do automatically log your IP address (the Internet address of your computer) and other information such as your browser type, operating system, the web page that you were visiting before accessing our Website and Service, the pages or features of our Website and Service to which you browsed to give us an idea of which part of our Website and Service you visit and how long you spend there (we refer to this information as “Log Data”). But we do not link your IP address to any PII unless you have logged in via your account. We use Log Data to administer the Website and Service and we analyze (and may engage third parties to analyze) Log Data to improve, customize and enhance the Website and Service by expanding their features and functionality and tailoring them to our users’ needs and preferences.
- Information Sent by Your Mobile Device: We collect certain information that your mobile device sends when you use our Website and Service, like a device identifier, user settings and the operating system of your device, as well as information about your use of our Website and Service. You understand that, by logging in on your mobile device, some information pertaining to your medical treatment may be stored to your mobile device. We are not responsible for any unauthorized access by any third party to such information on your mobile device.
- Location Information: When you use our website, we may collect and store information about your location by converting your IP address into a rough geo-location or by accessing your mobile device’s GPS coordinates or course location if you enable location services on your device. We may use location information to improve and personalize our Website for you. If you do not want us to collect location information, you may disable that feature on your mobile device.

## Your Choices

Opt-Out. We may periodically send you free newsletters and e-mails that directly promote our Service. When you receive such promotional 4 3041753v.1 communications from us, you will have the opportunity to “opt-out” (either through your account or by following the unsubscribe instructions provided in the e-mail you receive). We do need to send you certain communications regarding the Service and you will not be able to opt out of those communications – e.g., communications regarding updates to our Terms of Service or this Privacy Policy or information about billing.

## Information Sharing and Disclosure

Your PII is not shared outside of the Companies without your permission, except as described below.

- Information Shared with Our Services Providers: We may engage third-party services providers to work with us to administer and provide the Service. These third-party services providers have access to your PII only for the purpose of performing services on our behalf and are expressly obligated not to disclose or use your PII for any other purpose.
- Information Shared with Third Parties: We may share your aggregated information and non-identifying information with third parties to conduct ongoing quality improvement activities, or for industry research and analysis, demographic profiling and other similar purposes.
- Information Disclosed in Connection with Business Transactions. Information that we collect from our users, including PII, is considered to be a business asset. Thus, if we are acquired by a third party as a result of a transaction such as a merger, acquisition or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your PII, may be disclosed or transferred to a third party acquirer in connection with the transaction.
- Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to enforce our Terms of Service, (ii) to respond to claims, legal process (including subpoenas); (iii) to protect our property, rights and safety and the property, rights

and safety of a third party, our users, or the public in general; (iv) to stop any activity that we consider illegal, unethical or legally actionable activity; and (v) as required in accordance with HIPAA or related applicable local, state or federal laws (please refer to the HIPAA Policy).

### **Your Ability to Review Your Account and Information**

If you are a registered user with an account, you can review your PII by going to <https://www.therapyportal.com/p/unlockcounseling/> and signing in.

### **Data Security**

Your account information is password-protected for your privacy and security. The Companies safeguard the security of the information you provide to us with physical, electronic, and managerial procedures. In certain areas of our Website, we use industry-standard SSL-encryption to enhance the security of data transmissions. While we strive to protect your PII, we cannot ensure the security of the information you transmit to us, and so we urge you to take every precaution to protect your PII when you are on the Internet. Change your passwords often, use a combination of letters and numbers, and make sure you use a secure browser.

### **Responding to Do Not Track Signals**

Our Website does not have the capability to respond to “Do Not Track” signals received from various web browsers.

### **Children and Privacy**

Our Website and Service do not target and are not intended to attract children under the age of 13. We do not knowingly solicit PII from children under the age of 13 or send them requests for PII. If we learn that we have collected PII of a child under 13 directly from that child we will take steps to delete such information from our files as soon as possible. Notwithstanding the foregoing, we may collect PII about children under 13 that parents or guardians provide to us when establishing an account for their children’s records.

### **Third Party Sites**

The Website and Service contain links to other sites that are owned or operated by third parties. We are not responsible for the content, privacy or security practices of any third parties. To protect your information, we encourage you to learn about the privacy policies of those third parties.

### **International Transfer**

Your information is stored by the Companies on controlled servers with limited access and may be stored and processed in the United States or any other country where the Companies or agents are located. If you’re located outside the United States and choose to provide your PII to us, we may transfer your PII to the United States and process it there. Those who choose to access and use the Service from outside the U.S. do so on their own initiative, at their own risk, and are responsible for compliance with applicable laws.

Questions or Suggestions If you have questions or concerns about our collection, use, or disclosure of your PII, please contact us:

Unlock Counseling PLLC  
ATTN: Sara White, Owner and Lead Therapist  
848 Dodge Ave #224, Evanston, IL 60202  
sara@unlockcounseling.com  
Phone 224-204-4101 | Fax 224-714-0971

## **HIPAA NOTICE OF PRIVACY PRACTICES**

Original: 01/01/2022

Updated: 01/18/2024

We are legally required to give you information about how we use and treat your private therapy record. This information about you that may identify you and that relates to your past, present or future physical or mental health or condition and related health care services is referred to as Protected Health Information ("PHI"). This Notice of Privacy Practices describes how we may use and disclose your PHI in accordance with applicable law, including the Health Insurance Portability and Accountability Act ("HIPAA"), regulations promulgated under HIPAA including the HIPAA Privacy and Security Rules, and the NASW Code of Ethics. It also describes your rights regarding how you may gain access to and control your PHI.

The privacy of your mental health information is important to us. We understand that your mental health information is personal and we are committed to protecting it. We create a record of the care and services you receive at our practice. We need this record to provide you with quality of care and continuity of care and to comply with certain legal requirements. This notice will tell you about the ways we may use and share mental health information about you. We also describe your rights and certain duties we have regarding the use and disclosure of mental health information.

### **OUR LEGAL DUTY**

The law requires us to:

- Keep your mental health records private.
- Give you this notice describing our legal duties, privacy practices, and your rights regarding your mental health records.

We have the right to:

- Change our privacy practices and the terms of this notice at any time, provided that the changes are permitted by law.
- Make the privacy practices and the new terms of our notice effective for all mental health records that we keep, including information previously created or received before the changes.

### **NOTICE OF CHANGE TO PRIVACY PRACTICES**

Before we make an important change in our privacy practices, we will change this notice and make the new notice available upon request.

### **USE AND DISCLOSURE OF YOUR MENTAL HEALTH INFORMATION**

The following section describes different ways that we use and disclose mental health information. For each kind of use or disclosure, we will explain what we mean and give an example. Not every use or disclosure will be listed. However, we have listed all of the different ways we are permitted to use and disclose mental health information. We will not use or disclose your mental health information for any purpose not listed below without your specific authorization. Any specific written authorization you provide may be revoked at any time by writing to us. Revocation will not apply to information that has already been released.

For Treatment/Evaluation: We may use mental health information about you to provide you with psychotherapy services. We may disclose mental health information about you to your primary care physician if it is required by your insurance or managed care company. Also, we may disclose mental health information about you to a referring or referred mental health provider if you require additional services. From time to time, it is helpful for us to consult with other professionals regarding your treatment. In such events, our consultants are also legally bound by the privacy practice policies.

For Payment: We may use and disclose your mental health records for payment purposes. We may need to supply your health insurance plan with information about treatment you received at our practice so that your health plan will pay for services that were incurred. We may also tell your health plan about a treatment that you are going to receive to get approval or to determine if your plan will pay for the treatment.

Business Associates: We may also disclose your health information to third-party business associates (for example, an accounting firm or billing company) that perform activities or services on our behalf. Each business associate must agree in writing to protect the confidentiality of your information.

Additional Uses and Disclosures: In addition to using and disclosing your mental health information for treatment, payment, and health care operations, we may use and disclose mental health information without your authorization, consent, or opportunity to object for the following purposes:

- Notify or help notify a family member, a personal representative, or another person responsible for your care about your location, general condition, or death. If you are present, we will get your permission if possible before we share or give you the opportunity to refuse permission. In case of an emergency and if you are not able to give or refuse permission, we will share only the health information that is directly necessary for your health care, according to our professional judgement.
- Required by Law. We may use or disclose your health information to the extent that the use or disclosure is required by federal, state, or local law, but only to the extent and under the circumstances provided in such law.
- Specialized Government Functions. Subject to certain requirements, we may disclose or use your mental health information for military personnel and veterans, for national security and intelligence activities, for protective services for the President and others, for suitability determinations for the Department of State, for correctional institutions and other law enforcement custodial situations, and for governmental programs providing public benefits.
- Court Orders and Judicial and Administrative Proceedings. We may disclose your mental health records in response to a court or administrative order, subpoena, discovery request, or other lawful process, under certain circumstances. Under limited circumstances, such as a court order, warrant, or grand jury subpoena, we may share your mental health records with law enforcement officials concerning the mental health records of a suspect, fugitive, material witness, crime victim, or missing person.
- Public Health Activities. As required by law, we may disclose your mental health records to public health or legal authorities charged with preventing or controlling disease, injury or disability, including child abuse or neglect. We may also, when we are authorized by law to do so, notify a person who was exposed to a communicable disease or otherwise be at risk of contracting or spreading a disease or condition.
- Victims of Abuse, Neglect, or Domestic Violence. As mandated reporters, we are required by law to report suspicions of child and elder abuse/neglect/endangerment. We may disclose your records to appropriate authorities if we have reason to believe that you are a possible victim of abuse, neglect, or domestic violence, or the possible victim of other crimes, or if you disclose knowledge of such crimes committed against others. We may share your mental health records if it is necessary to prevent a serious threat to your health or safety or the health and safety of others.
- Public Safety: We may disclose your records if necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public. If information is disclosed to prevent or lessen a serious threat it will be disclosed to a person or persons reasonably able to prevent or lessen the threat, including the target of the threat. We are also required by law to report suspicions of your being a "clear and present danger" via the Illinois Department of Human Services (DHS) Firearm Owner's Identification (FOID) Mental Health Reporting System.
- Health Oversight Activities. We may disclose your mental health records to any agency providing health oversight activities authorized by law, including audits, civil, administrative, or criminal investigations or proceedings, inspections, licensure, or disciplinary actions, or other authorized activities.

## **YOUR INDIVIDUAL RIGHTS**

- You have the right to look at or receive copies of your mental health records. You must make your request in writing. You may request access by sending your request to the contact person(s) listed at the end of this notice. For evaluations, raw data (i.e., test forms/responses) can only be released to a qualified mental health professional.

- You have the right to receive a list of all the times we or our business associates shared your records for purposes other than treatment, payment and health care operations and other specified exceptions.
- You have the right to request that we place additional restrictions on our use or disclosure of your records. We are not required to agree to these additional restrictions, but if we do, we will abide by our agreement (except in the case of an emergency).
- You have the right to request that we communicate with you about your mental health information by different means or to different locations. Your request that we communicate your mental health records to you by different means or at different locations must be made in writing to the contact person(s) listed at the end of this notice.
- You have the right to request that we change your mental health record information. We may deny your request if we did not create the information you want changed or for certain other reasons. If we deny your request, we will provide you with a written explanation. You may reply with a statement of disagreement that will be added to the information that you wanted changed. If we accept your request to change the information, we will make reasonable efforts to tell others of the change, including people you name, and to include the changes in any future sharing of the information.
- If you have received this notice electronically and wish to receive a paper copy, you have the right to obtain a paper copy by making a request to the contact person(s) listed at the end of this notice.
- You have the right to revoke your consent at any time, except in situations where we have already made disclosures based on your prior authorization.

## **QUESTIONS AND COMPLAINTS**

If you have any questions about this notice, please contact:

Unlock Counseling PLLC  
ATTN: Sara White, Owner and Lead Therapist  
848 Dodge Ave #224, Evanston, IL 60202  
sara@unlockcounseling.com  
Phone 224-204-4101 | Fax 224-714-0971

If you believe we have violated your privacy rights, you have the right to file a complaint with the U.S. Department of Health and Human Services mail, fax, e-mail, or via the OCR Complaint Portal. For more information, visit HHS information page about filing complaints [here](#).

We will not retaliate against you for filing a complaint.