PRIVACY POLICY

Effective Date: November 3, 2025

This Privacy Policy (“policy”) describes how Gratia Counseling & Consulting, LLC ("Company," "we," "us," or "our") processes certain information we collect from you on our website, {{website}} (the "Website"). This policy is designed to assist you in understanding how we collect and use the personal information you provide to us and to help you make informed decisions when using our Website.

This Privacy Policy applies only to personal information collected through our Website and does not apply to Protected Health Information (PHI). If you are a patient receiving healthcare services from Gratia Counseling & Consulting, LLC, any PHI we collect, use, or disclose is governed by the Health Insurance Portability and Accountability Act (HIPAA) and related federal and state laws. Our handling of PHI is detailed in our Notice of Privacy Practices (NPP), which outlines your rights and how we protect your health information. You can view our Notice of Privacy Practices for more information.

Please note that while we take security and privacy seriously, this Privacy Policy does not govern any health-related information you provide through patient portals, appointment scheduling, secure messaging, or telehealth services. Any PHI collected through those channels is managed under HIPAA regulations and subject to strict privacy protections.

By using this Website, you agree to the terms of this Privacy Policy.

Your use of this Website is also governed by our Terms of Use, which are incorporated by reference into this Policy. By accessing or using this Website, you acknowledge and agree to be bound by both this Privacy Policy and our Terms of Use.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This policy applies to information we may collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website or our practice.
- Through mobile or desktop applications used for scheduling, patient intake, or telehealth services.

- When you engage with our online advertising or third-party services linked to this Website.
- From third-party platforms that assist in patient care, such as appointment scheduling systems, electronic health record (EHR) platforms, or secure messaging services.

1. Information We Collect

Information We Collect About You and How We Collect It

We may collect several types of information from and about users of our Website, including information:

- Personal Information – Information that can identify you, such as your name, postal address, email address, phone number, or any other identifier by which you may be contacted online or offline.
- Non-Identifiable Information – Data that does not directly identify you but relates to your interactions with our Website, such as general location data, browsing activity, or aggregated usage statistics.
- Technical Information – Details about your internet connection, the device and browser you use to access our Website, and website usage data.

We may collect this information:

- Directly from You – When you provide information by scheduling an appointment, filling out forms, contacting us, or engaging with our services.
- Automatically – As you navigate our Website, certain data may be collected through cookies, log files, and other tracking technologies. This may include usage details, IP addresses, device information, and browsing activity.
- From Third Parties – We may receive information from service providers that help facilitate appointments, secure patient communications, analytics, or marketing efforts.

Personal Information You Provide to Us. You may submit personal information, which is information that can be used to identify you individually, when you interact with our website. We may collect personal information that you voluntarily provide when you:

- Information provided through forms on our Website – Such as when scheduling an appointment, contacting our office, or requesting more information about our services.
- Correspondence records – If you contact us via email, text, or other electronic means, we may store records of your communication, including your email address and any details you provide.
- Feedback or surveys – If we conduct patient experience surveys or request feedback, we may collect responses for internal improvement.

- Billing and payment details – If you make a payment for medical services through our Website, we may collect necessary billing information via a secure third-party payment processor.
- Patient portal interactions – If applicable, we may collect information you submit through secure patient communication platforms integrated with our Website.

This may include your name, email address, phone number, and other identifiers. If you make a payment through our Website, billing details may be collected by a third-party payment processor—we do not store credit card details.

Information Collected Automatically. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Website usage details – Information about your visits to our Website, such as traffic data, navigation patterns, and the pages you access.
- Technical information – Details about your device, including your IP address, operating system, browser type, and other system settings.
- Location data (if enabled) – If you grant permission, we may collect general location data to optimize your Website experience.

This data may be collected using cookies, log files, and similar tracking technologies. It is primarily used for analytics, security monitoring, and Website optimization. We do not automatically collect personal health information (PHI). Any health-related data you provide is subject to our separate HIPAA-compliant policies.

It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. By continuing to use our Website, you consent to our use of cookies unless you opt out through your browser settings or our cookie management tool. If required by applicable privacy laws, we will request your explicit consent before using tracking

technologies that collect personal data. You may also manage your cookie preferences using our website's cookie management tool.

- Web Beacons. Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We may use certain third-party technology vendors (such as Google) in connection with your activity on certain pages, including for advertising purposes and to understand details about your use of the Site (including referring URL, cookie ID, device type, what web pages you visited, how you engaged with our content, clicks, cursor movement, and scrolling activity).

We may use tracking technologies like Google Analytics on certain pages. For more information on how Google Analytics uses data it collects, visit **policies.google.com/technologies/partner-sites**. To opt out of Google Analytics, visit: **tools.google.com/dlpage/gaoptout**. To adjust your Google advertising settings, visit: **myadcenter.google.com**.

Information From Third Parties. In some cases, we may receive information about you from third parties to improve our services and interactions with you. This may include information from third-party service providers, such as scheduling software, payment processors, or marketing tools that facilitate our business operations. Additionally, if you engage with us on social media or other online platforms, we may collect publicly available information from your profile as permitted by the platform's terms and your privacy settings.

2. How We Use Your Information.

We use the information we collect, including any personal information, to operate, improve, and personalize our services. Specifically, we may use your personal information to:

- Respond to inquiries – If you contact us, we may use your information to respond to your questions or requests.
- Schedule and manage appointments – We use your information to book appointments, confirm schedules, and provide appointment reminders.
- Send service-related communications – This may include updates about our services, changes to office hours, or important notifications.
- Provide customer support – If you have concerns about your interactions with our practice, we may use your information to assist you.
- Present our Website and its content to you – To ensure a smooth browsing experience and optimize how you interact with our Website.

- Provide you with requested services – This includes sharing information about medical services, treatments, or other healthcare-related offerings.
- Comply with legal and contractual obligations – If you enter into an agreement with us (such as for telehealth services or payment processing), we may use your information for billing and record-keeping purposes.
- Notify you about changes – If we update our policies, services, or Website functionality, we may send you relevant notices.
- Send marketing communications (with your consent) – If you opt-in, we may send you updates about promotions, new services, or practice announcements. You can unsubscribe at any time by clicking the "unsubscribe" link in marketing emails.
- For any other purpose with your consent – If a situation arises where we need to use your information differently, we will obtain your consent before doing so.

If you submit your contact details through our Website, we may use them to follow up on requests, confirm appointments, or send important updates about our services. With your consent, we may send marketing emails about services, promotions, or updates. You can opt out of marketing emails at any time by clicking the "unsubscribe" link in the email.

Additionally, we may use automatically collected data to analyze website traffic, improve our online experience, and maintain security. We may also use cookies and similar tracking technologies to enhance functionality and provide relevant content. If you have given consent, we may send occasional marketing emails about new services, special offers, or relevant updates, and you can opt out at any time.

3. How We Share Your Information

We do not sell, rent, or trade your personal information. However, we may share necessary information with trusted third-party service providers that assist us in delivering healthcare-related services, such as appointment scheduling platforms, EHR systems, or payment processors. Any data shared is done in accordance with HIPAA and applicable privacy laws to ensure the confidentiality of your information.

We also may disclose your personal information (i) in the event we sell or transfer all or a portion of our business assets (e.g., further to a merger, liquidation, reorganization, or any other business transaction, including negotiations of such transactions); (ii) to comply with legal requirements (for example, to respond to court orders, subpoenas, government or law enforcement agency requests, or other legal processes); (iii) to protect or defend Gratia Counseling & Consulting, LLC; (iv) where we perceive a threat or risk to individuals or property as a result of activity on our website; (v) in connection with their inappropriate use of our website, noncompliance with our

Terms of Use, or a complaint filed about your use of our website; or (vi) with your consent or at your direction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Promotional Communication. We do not sell or share your personal information with third parties for advertising purposes. However, if you opt-in, we may send occasional updates about our medical services, promotions, or practice announcements.
    - Opting Out of Promotional Emails (if applicable): If you no longer wish to receive marketing emails from us, you can unsubscribe by clicking the "unsubscribe" link at the bottom of any marketing email or by emailing us at brooke@gratiacounseling.com with your request.
    - Opting Out of Text Communications (if applicable): If you receive text reminders or promotional messages, you can opt out by replying STOP to the message.
- Patient Communications. Even if you opt out of promotional messages, we may still send service-related communications such as appointment confirmations, reminders, or important policy updates. These communications are necessary for providing healthcare services and cannot be opted out of.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's website.

4. Our Commitment to Security

Gratia Counseling & Consulting, LLC has adopted commercially reasonable security standards to prevent unauthorized access of information. These standards include physical, electronic, and procedural safeguards to protect and secure the information that we collect from you.

While we follow generally accepted industry standards to protect the personal information submitted to us, no method of transmission over the internet is 100% secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own

risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website. If we become aware of a security breach affecting your personal information, we will take appropriate measures, such as notifying affected individuals as required by law.

5. Children's privacy

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at brooke@gratiacounseling.com.

6. Changes to Our Privacy Policy

Gratia Counseling & Consulting, LLC reserves the right to change this policy at any time without advance notice to our users. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. Modifications to the policy shall be effective when they are posted. We will notify you of any changes to the policy by updating the “Effective Date” at the top of this page. Your continued use of the website following the posting of any such modifications constitutes your acceptance and agreement to be bound by such modifications. We encourage you to check this policy regularly to see if we have made any modifications to this policy.

7. Contact Us

If you have questions regarding our website privacy policy or other general questions, please contact Gratia Counseling & Consulting, LLC by email, brooke@gratiacounseling.com; by phone, 763-333-1553; or by mail, 2705 Bunker Lake Blvd NW, Suite 103, Andover, MN 55304.