



## PRIVACY POLICY

**THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

Effective Date: March 15, 2024

### **PURPOSE OF THIS PRIVACY POLICY**

At Elite DNA Behavioral Health, your privacy is important to us. Our Privacy Policy describes the information we collect, how we collect information, and the reasons we collect information. This Privacy Policy also describes the choices you have with the information we collect, including how you can manage, update, or request to delete information.

Please take a moment to review this Privacy Policy. You may scroll through this Privacy Policy or use the headings below. It is important that you understand this Privacy Policy. By using our Platform, you are agreeing to the terms of this Privacy Policy. If you have any questions or concerns about this Privacy Policy, you may contact our compliance team at the email and phone numbers listed on our website, <https://elitedna.com/privacy-compliance/>.

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### **Who is Elite DNA Behavioral Health?**

DNA Comprehensive Therapy Services LLC (dba Elite DNA Behavioral Health) is the parent company to a group of Florida- based mental and behavioral health care providers and facilities. Elite DNA Behavioral Health supports its subsidiaries by assisting users with the ability to obtain a telemedicine consultation and in-person medical services provided by medical practitioners including, but not limited to, Elite DNA Behavioral Health, Family Counseling Associates A Division Of Elite DNA Behavioral health and Impact Behavioral Health A Division of Elite DNA Behavioral Health (collectively “**Medical Group**”), a medical group with a network of United States based health care providers (each, a “**Provider**”). The Medical Group, for purposes of compliance with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), has chosen to comply with the standards set by HIPAA as a single entity, and has formed an affiliated covered entity. This means that the Medical Group will share protected health information with each other for the treatment, payment, and health care operations of the Medical Group. Medical Group is responsible for providing you with a Notice of Privacy Practices describing its collection and use of your health information, not DNA Comprehensive Therapy Services LLC.





**Key Terms & Definitions and Our Privacy Policy**

<b>Key Term</b>	<b>Definition</b>
our “App(s)”	Patient Portal, Health Note, and other applications.
“Personal Information”	Any information relating to an identified or identifiable individual and any information listed <a href="#">here</a> .
our “Platform”	Our Website and/or our Apps.
“Privacy Policy”	This privacy policy.
“Products”	Any products available for purchase on our Platform.
our “Services”	Any services provided through our Platform.
our “Terms of Service”	Our terms of service located <a href="#">here</a> .
our “Website(s)”	Our websites, including: <ul style="list-style-type: none"><li>• <a href="https://elitedna.com/">https://elitedna.com/</a></li><li>• <a href="https://careers.elitedna.com/">https://careers.elitedna.com/</a></li></ul>
“Elite,” “we,” “us,” or “our”	DNA Comprehensive Services LLC dba Elite DNA Behavioral Health





**When does our Privacy Policy apply?**

This Privacy Policy describes the types of information we may collect from you when:

- You visit or use our Platform, including our Website and/or our Apps;
- We communicate in e-mail, text message, and other electronic messages between you and us; and
- We communicate in person, such as on the phone or through a telehealth visit.

**When does our Privacy Policy not apply?**

This Privacy Policy does not apply to information collected by any other website operated either by us or by a third party, unless the website is listed above or links to this Privacy Policy. It also does not apply to any website that we may provide a link to or that is accessible from our Platform.

This Privacy Policy does not apply to information collected from users who log-in to the password-protected and secure portions of our Platform ("**Secure Platform**"). The Secure Platform allows users who obtain the Services ("**Customers**") to perform certain functions or obtain the Services (such as telehealth visits from Medical Group or Providers). All information collected and stored by us or added by Customers into such Secure Platforms is considered Protected Health Information ("**PHI**") and/or medical information and is governed by applicable state and federal laws that apply to that information, HIPAA. How we use and disclose such PHI is in accordance with the applicable Notice of Privacy Practices provided to you by the Medical Group. We will not use or disclose information collected from the Secure Platform or received from Medical Group or your Provider for advertising, marketing, or other use-based data mining purposes. We will not sell any PHI.

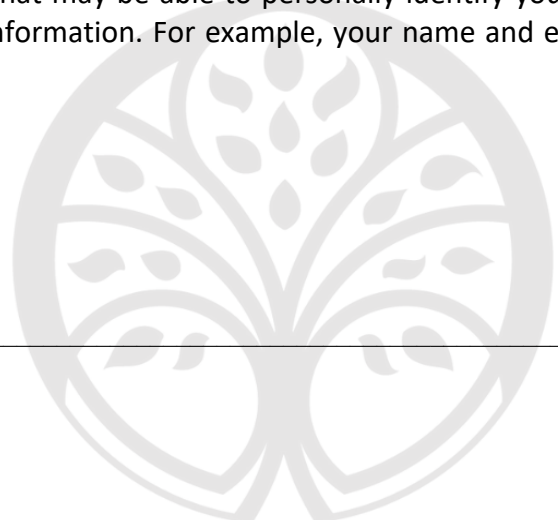
**Our Privacy Policy and Terms of Use**

This Privacy Policy is incorporated into our Terms of Use, which also apply when you use our Platform.

**Personal Information**

**What is Personal Information?**

Personal information is information from and about you that may be able to personally identify you. We treat any information that may identify you as personal information. For example, your name and e-mail address are personal information.

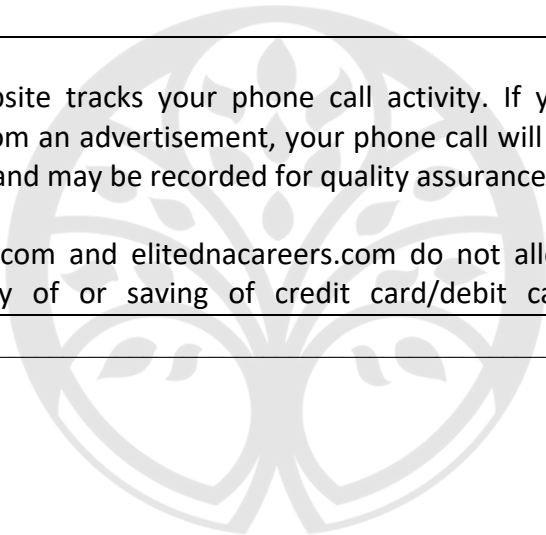




**What types of Personal Information do we collect on our website?**

We may collect and use the following personal information (hereinafter, collectively referred to as “Personal Information”):

<b>Categories of Personal Information</b>	<b>Specific Types of Personal Information Collected</b>
Personal Identifiers	First name, last name, email address, and in some cases, zip code or location information.
Internet or other electronic network activity information	IP address, device mode, device ID, OS version, device language, operating system, browser type, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.
Geolocation data	Physical location or movements, local time, and local time zone.
User Generated Content	Online reviews that are publicly posted on online platforms may be published or displayed (hereinafter, “Posted”) on public areas of our Website or transmitted to other users of the Website or other third parties.
Information that identifies, relates to, describes, or is capable of being associated with a particular individual	Our website tracks your phone call activity. If you come from an advertisement, your phone call will be tracked and may be recorded for quality assurance.  elitedna.com and elitednacareers.com do not allow for entry of or saving of credit card/debit card





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numbers, medical conditions or other family medical history. Payment and medical information are housed in our HIPAA compliant portal Athena.

## How do we collect your Personal Information?

We collect most of this Personal Information directly from you. For example, when we speak to you by phone, text message, and e-mail. Additionally, we will collect information from you when you visit our Website or App and fill out forms, use our Software, wear one of our Devices, or purchase our Services. We may also collect Personal Information in the following ways:

- **When you make payments through the Platform.** We do not collect or store financial account information, though we may receive transaction identifiers and summary information that does not include credit card or bank account numbers.
- **When You Contact Us.** When you contact Elite directly, such as when you contact our Customer Support team, we will receive the contents of your message or any attachments you may send to us, as well as any additional information you choose to provide.
- We will also collect information automatically as you navigate through our Platform. We use the following technologies to automatically collect data:
  - **Cookies.** We and our service providers may use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our Platform or Services through your computer or mobile device. A “cookie” is a small file or piece of data sent from a website and stored on the hard drive of your computer or mobile device. Some of the cookies we use are "session" cookies, meaning that they are automatically deleted from your hard drive after you close your browser at the end of your session. Session cookies are used to optimize performance of the Website and to limit the amount of redundant data that is downloaded during a single session. We also may use "persistent" cookies, which remain on your computer or device unless deleted by you (or by your browser settings). We may use persistent cookies for various purposes, such as statistical analysis of performance to ensure the ongoing quality of our Platform and/or the Services. We and third parties may use session and persistent cookies for analytics and advertising purposes, as described herein. On your computer, you may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting you may be unable to access or use certain parts of our Platform or the Services. Unless you have adjusted your browser or operating system setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Platform.



- **Facebook Pixel and Instagram.** We may have a Facebook Pixel/Instagram, a web analytics and advertising service provided by Facebook Inc. (“Facebook”) on our Platform. With its help, we and our customers can keep track of what users do after they see or click on a Facebook or Instagram advertisement, keep track of users who access our Platform or advertisements from different devices, and better provide advertisements to our target audiences. Elite DNA will never use your personal information to serve ads to you or people like you. The data from Facebook Pixel and Instagram is also saved and processed by Facebook. Facebook can connect this data with your Facebook or Instagram account and use it for its own and others advertising purposes, in accordance with Facebook’s Data Policy which can be found at <https://www.facebook.com/about/privacy/>. Please click here if you would like to withdraw your consent for use of your data with Facebook Pixel <https://www.facebook.com/settings/?tab=ads#> = .
- **Google Analytics.** We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) to collect certain information relating to your use of our Platform. Google Analytics uses cookies, to help our Platform analyze how users use our Website. You can find out more about how Google uses data when you visit our Platform by visiting “How Google uses data when you use our partners' sites or apps”, (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)). For more information, please visit Google and pages that describe Google Analytics, such as [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).
- **Other third-party tools.** We use other third-party tools such as heat maps which allow us to track the performance of our Platform. These tools provide us with information about errors, app and website performance, and other technical details we may use to improve our Platform and/or the Services. For more information related to these third-party analytics providers please review [How do we collect your Personal Information?](#)

### **How do we use your Personal Information?**

We may use your Personal Information for the following purposes:

- Operate, maintain, supervise, administer, and enhance our Platform or the Services, including monitoring and analyzing the effectiveness of content on the Platform, aggregate site usage data, and other usage of the Platform and/or the Services such as assisting you in completing the registration process.
- Provide our Services to you, in a custom and user-friendly way.
- Provide you with information, or Services that you request from us or that may be of interest to you.
- Promote and market our Platform and/or the Services to you. For example, we may use your Personal Information, such as your e-mail address, to send you news and newsletters, special offers, and promotions, or to otherwise contact you about Products or information we think may interest you. We also may use the information that we learn about you to assist us in advertising our services on third party websites. You can opt-out of receiving these e-mails at any time as described below.





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- To provide you notices or about your account.
- Contact you in response to a request.
- To notify you about changes to our Platform and/or the Services we offer or provide through them.
- Fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Anonymize and aggregate information for analytics and reports
- To respond to law enforcement requests, court orders, and subpoenas and to carry out our legal and contractual obligations.
- Authenticate use, detect fraudulent use, and otherwise maintain the security of our Platform and the safety of others.
- To administer surveys and questionnaires.
- To provide you information about goods and services that may be of interest to you, including through newsletters.
- Any other purpose with your consent.

### How do we share your Personal Information?

We may share Personal Information with third parties in certain circumstances or for certain purposes, including:

- **Our business purposes.** We may share your Personal Information with our staff, affiliates, vendors, service providers, and business partners, including our data hosting and data storage partners, analytics and advertising providers, technology services and support, and data security advisors. We may also share your Personal Information with professional advisors, such as auditors, law firms, and accounting firms. If you request an appointment through a form or a phone call, that information will be transmitted to Elite DNA scheduling staff in order to contact you to schedule. You will receive no more than 3 calls and emails in response to your request for an appointment.
- **Your healthcare providers or family.** With your consent, we may share your information, including information collected from your use of our Platform, with your health care providers and/or family members (e.g., immediate family or friends) that you designate to receive your information.
- **Other health-focused mobile apps.** With your consent, we may share your profile information and data collected from your connected devices with other health-focused mobile applications installed on your mobile device to help you track your health and wellness information. If you share your information with these apps, your Personal Information, including your health information, will be used in accordance with privacy policies for those separate apps, not this Privacy Policy.
- **With your consent.** We may share your Personal Information if you request or direct us to do so.
- **Compliance with law.** We may share your Personal Information to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries.



- **Business Transfer.** We may share your Personal Information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our users are among the assets transferred.
- **To enforce our rights.** We may share your Personal Information to enforce any applicable terms and conditions and Terms of Use, and to ensure the safety and security of our Services and our users.
- **De-identified information.** We may also disclose de-identified information, so that it cannot be reasonably used to identify any individual, with third parties for marketing, advertising, research, or similar purposes.
- **To market our products and services.** We may share your Personal Information with affiliates and third parties to market our products and services.
  
- **Third Party Analytics.** We use Google Analytics to understand and evaluate how visitors interact with our Platform and/or the Services. These tools help us improve our Platform and/or the Services, performance, and your experience.

### **Your choices about how we share your Personal Information.**

This section of our Privacy Policy provides details and explains how to exercise your choices. We offer you choices on how you can opt out of our use of tracking technology, disclosure of your Personal Information for our advertising to you, and other targeted advertising. **We do not control the collection and use of your information collected by third parties.** These third parties may aggregate the information they collect with information from their other customers for their own purposes. You can opt out of third parties collecting your Personal Information for targeted advertising purposes in the United States by visiting the [National Advertising Initiative's \(NAI\) opt-out page](#) and the [Digital Advertising Alliance's \(DAA\) opt-out page](#).

Each type of web browser provides ways to restrict and delete cookies. Browser manufacturers provide resources to help you with managing cookies. Please see below for more information.

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)





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For other browsers, please consult the documentation that your browser manufacturer provides.

If you do not wish to have your e-mail address used by Elite to promote our own products and services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any e-mail or other marketing communications you receive from us or logging onto your Account Preferences page. This opt-out does not apply to information provided to Elite as a result of an appointment, or your use of our Platform and/or our Services. You may have other options with respect to marketing and communication preferences through our Platform.

You may also see certain ads on other websites because we participate in advertising networks. Ad networks allow us to target our messaging to users through demographic, interest-based, and contextual means. These networks track your 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 you advertisements that may be tailored to your individual interests.

### **Other reasons required by law**

There may be circumstances pursuant to federal or state law that would require the disclosure of your information. For more information, you can consult the United States Code, Code of Federal Regulations, and Florida Statutes.

### **How do I access and correct my Personal Information?**

You can review and change your Personal Information by logging into our Services and visiting the Patient Portal sections of our Platform. You may also Contact Us to inform us of any changes or errors in any Personal Information we have about you to ensure that it is complete, accurate, and as current as possible or to delete your account. We cannot delete your personal information except by also deleting your account with us. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.

### **Who may use the Services?**

Elite DNA operates subject to state and federal regulations, and the Platform and/or our Services may not be available in your state. You represent that you are not a person barred from enrolling for or receiving the Services under the laws of the United States or other applicable jurisdictions in which you may be located. Access to and use of the Platform and/or our Services is limited exclusively to users located in states within the United States where the Platform and/or the Services is available. The Platform and/or the Services are not available to users located outside the United States. Accessing the Platform and/or obtaining the Services from jurisdictions where content is illegal, or where we do not offer the Platform and/or the Services, is prohibited.



## **Children's Privacy**

Elite understands the importance of protecting children's privacy in the interactive online world. Our Platform is not designed for, or intentionally targeted at, children under the age of 18. It is not our policy to intentionally collect or maintain information about anyone under the age of 18. No one under the age of 18 should submit any Personal Information the Platform, and if we learn that we have collected or received Personal Information from a child under 18, we will delete that information. If you are the parent or guardian of a child under 18 years of age whom you believe might have provided us with their Personal Information, you may Contact Us to request the Personal Information be deleted.

We do not knowingly collect or sell Personal Information from children under the age of 18. If you are between 18 and 18 years of age, you must get permission from your parents or legal guardian before using our Platform. If you are under the age of 18, do not use or provide any information on or to the Platform or through any of its features. If we learn we have collected or received Personal Information from a child under the age of 18 without verification of parental consent, we will delete it. If you are the parent or guardian of a child under 18 years of age whom you believe might have provided use with their Personal Information, you may Contact Us to request the Personal Information be deleted.

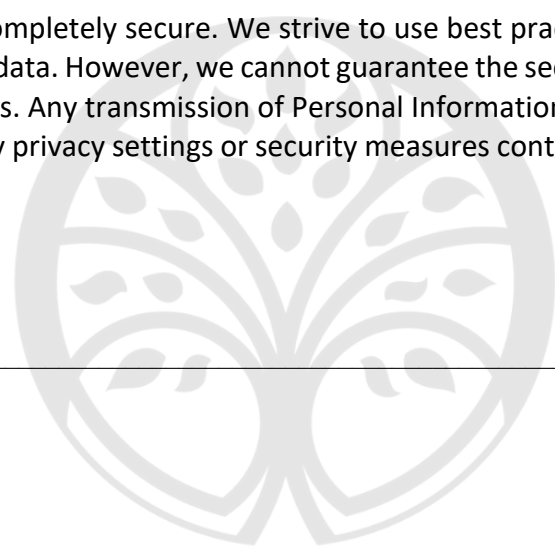
## **Does Elite respond to Do Not Track signals?**

Some web browsers have a "Do Not Track" feature. This feature lets you tell websites you visit that you do not want to have your online activity tracked. These features are not yet uniform across browsers. Our Platform is not currently set up to respond to those signals.

## **Data Security**

We have taken steps and implemented administrative, technical, and physical safeguards designed to protect against the risk of accidental, intentional, unlawful, or unauthorized access, alteration, destruction, disclosure, or use. The Internet is not 100% secure and we cannot guarantee the security of information transmitted through the Internet. Where you have been given or you have chosen a password, it is your responsibility to keep this password confidential.

The sharing and disclosing of information via the internet is not completely secure. We strive to use best practices and industry standard security measures and tools to protect your data. However, we cannot guarantee the security of Personal Information transmitted to, on, or through our Services. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on our Platform, in your operating system, or mobile device.





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### **Changes to our Privacy Policy**

We may update our Privacy Policy periodically to reflect changes in our privacy practices, laws, and best practices. We will post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on our Website's homepage or our App's home screen. If we make material changes to our practices with regards to the Personal Information we collect from you, we will notify you by e-mail to the e-mail address specified in your account and/or through a notice on the Website's home page or the App's home screen. The date this Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically accessing the App or visiting our Website and reviewing this Privacy Policy to check for any changes.

### **Contact Us**

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, you may contact us at the contact information below.

### **How to Contact Us:**

Elite DNA Compliance and Privacy Officer  
4310 Metro Parkway Suite 205  
Fort Myers, FL 33916  
Telephone: 1-888-453-3114  
E-mail: [Compliance@elitedna.com](mailto:Compliance@elitedna.com)

