



360 Behavioral Health

Privacy Notice for California Residents

Effective Date: March 1, 2025

Last Reviewed: March 1, 2025

California consumers have a right to knowledge, access, correction, and deletion of their personal information under the California Consumer Privacy Act. This **Privacy Notice for California Residents** ("Notice") supplements the information contained in 360 Behavioral Health's (which for the purpose of this Notice includes California Psychcare, Inc. DBA 360 Behavioral Health, Behavior Respite in Action, Inc. DBA 360 Behavioral Health – Support Services, Z & S Management Corporation DBA 360 Behavioral Health – Management Services, and all other affiliates that may be acquired from time to time) Privacy Notices (available at www.360behavioralhealth.com) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("The CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA") (The CCPA and CPRA are collectively referred to herein as "CCPA") and any terms defined in the CCPA have the same meaning when used in this Notice.

360 Behavioral Health does not sell or share the personal information of California consumers as those terms are defined under the CCPA. This Notice does not apply to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals (see <https://360behavioralhealth.com/privacy-notice-for-california-residents-employees/>).

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). For clarification, Personal Information **does not** include health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the California Confidentiality of Medical Information Act ("CMIA"). We may collect personal information from you in a variety of different situations, including, but not limited to, on our website or third-party websites, your mobile device, through email, through company property, in physical locations, through the mail, and/or over the telephone or in person. Personal information **does not** include:

- Publicly available information from government records.
- Lawfully obtained, truthful information that is a matter of public concern.
- Deidentified or aggregated consumer information.
- Information **excluded** from the CCPA's scope, like:
 - ***health or medical information covered*** by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data; or

- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

If certain types of information are exempt from CCPA/CRPA, and therefore this policy, other Company privacy policies may apply such as our HIPAA Notice of Privacy Practices.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Possible Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Characteristics of protected classifications under California or federal law.	Characteristics of protected classes or groups under state or federal law, such as age, sex, disability, citizenship, primary language, immigration status, veteran or military status, and marital status.	YES
D. Commercial information.	Purchase information, such as products and services obtained, transaction history, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Network activity information.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES

G. Geolocation data.	Physical location or movements, including the use of an internet website, application, or device, and GPS location data from mobile devices used for clinical or other company services.	YES
H. Sensory information.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment information.	Current or past job history, including any professional degrees or certifications.	NO
J. Education information.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
Sensitive Personal Information Category		
L. Sensitive personal information.	<p>The CCPA requires that we tell you whether we collect any personal information that is described in California Civil Code § 1798.80(e). This includes:</p> <ul style="list-style-type: none"> • Social security number, driver's license, state identification card, or passport number • Account log-in, financial account • Precise geolocation, such as your physical access to a Company officer or the location of services • Racial or ethnic origin, religious or philosophical beliefs • The contents of mail, email, and text messages unless we are the intended recipient of the communication • Health information or sexual orientation <p>Note: While we collect information that generally falls within the sensitive personal information categories listed above, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a person and/or the information is solely collected for purposes covered by HIPAA or CMIA and thus falls outside of the scope of the CCPA. Information is provided for transparency purposes.</p>	YES

Sources from which Personal Information is Collected

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or services you request.
- Indirectly from you. For example, from observing your actions on our website.
- Third parties. For example, from a funding source or a referral agency.
- Government entities, such as confirmation of health insurance coverage.
- From our employees or contractors, such as through interactions with you before or after clinical services.
- From inferences generated by the Company's computer systems.

Use of Personal Information

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our services, we will use that personal information to respond to your inquiry.
- To manage the clinical relationship with us, including by providing clients and caregivers with ancillary services, clinical management services and client data maintenance and support services.
- To provide you with information or services that you request from Company.
- To support infrastructure, workforce management, and maintaining operations.
- To provide you with email alerts, event registrations, and other notices concerning Company's services, or news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and Company, including billing.
- To support our everyday operations, including to meet risk, legal, and compliance obligations.
- To provide, support, personalize, and develop our website and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests and prevent transactional fraud. For example, making sure your information is kept securely.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- For client and employment marketing purposes.
- As necessary or appropriate to protect the rights, property, or safety of Company and its employees, agents, affiliates, clients, or others.
- To improve efficiency, logistics, and supply chain management.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, workplaces, and business.

- To maintain records and comply with record retention requirements.
- For research, analysis, and service development, including to develop and improve our website, products, and services.
- To conduct internal audits, workplace investigations, or to perform workforce analytics, data analytics, and benchmarking.
- To manage, enhance, streamline, improve, or develop our business.
- Investigate and enforce compliance with and potential breaches of Company policies and procedures.
- Maintain commercial insurance policies and coverages.
- To respond to public health and governmental enforcement requests and as required by, and to comply with, applicable law, court order, governmental regulations, or funding source/insurance requirements.
- To assist the safety of our clients, workforce, offices, and public health. For example, to implement COVID-19 or other health procedures.
- To exercise or defend the legal rights of the Company and its employees, affiliates, customers, contractors, and agents.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct 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 bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users or consumers is among the assets transferred.

Sensitive Personal Information Use and Disclosure Purposes (“Permitted SPI Purposes”):

For specific transparency, we may use or disclose sensitive personal information for the following statutorily approved reasons:

- Performing actions that are necessary for our relationship and that an average consumer in an similar relationship with us would reasonably expect.
- Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, and/or confidentiality of stored or transmitted personal information.
- Defending against and prosecuting those responsible for malicious, deceptive, fraudulent, or illegal actions directed at the Company.
- Ensuring physical safety.
- Short-term, transient use, such as non-personalized advertising shown as part of a consumer’s relationship with us, so long as we do not (1) disclose the sensitive personal information to another third party; or (2) use it to build a profile about the consumer or otherwise alter the consumer’s experience outside their current employment with the Company.
- Services performed for the Company, including maintaining or servicing accounts, providing human resources and employee benefit administration, processing or fulfilling transactions, verifying client information, processing payments, or providing financing, analytic services, storage, or similar services for the Company.

- Activities required to verify, maintain, improve, upgrade, or enhance the services that we provide or control.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice. We shall not retain a consumer's Personal Information for longer than is reasonably necessary to achieve the disclosed collection and use purposes. For specific clarification, we do not use or disclose sensitive personal information for purposes other than the Permitted SPI Purposes – we do not collect or process sensitive personal information for the purpose of inferring characteristics about a consumer. We may collect, process, and disclose aggregated or deidentified information about our consumers for any purpose, without restriction.

Disclosure of Personal Information

We may disclose your personal information, including sensitive personal information, to a third party for a business purpose described above, such as to engage additional funding sources or to help us administer our services. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information with the following categories of third parties:

- Service providers to assist with business operations. For example, our information technology vendor to assist with IT security and maintenance.
- Third parties with whom you direct us to share your personal information.
- Other third parties such as data aggregators for business intelligence purposes.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

Personal Information Category	Business Purposes Disclosures
A: Identifiers	Internet service providers; Data analytic providers; Government entities; Operating systems and platforms; Service providers; Affiliates, partners, parent, or subsidiary organizations
B: California Customer Records personal information categories	Internet service providers; Data analytic providers; Government entities; Operating systems and platforms; Service providers; Affiliates, partners, parent, or subsidiary organizations
C: Protected classification characteristics under California or federal law	Internet service providers; Data analytic providers; Government entities; Operating systems and platforms; Service providers; Affiliates, partners, parent, or subsidiary organizations
D: Commercial information	None
E: Biometric information	None

F: Internet or other similar network activity	Internet service providers; Data analytic providers; Operating systems and platforms; Service providers; Affiliates, partners, parent, or subsidiary organizations
G: Geolocation data	None
H: Sensory data	None
I: Professional or employment-related information	None
J: Non-public education information	None
K: Inferences drawn from other personal information	None

Retention Period

Personal Information obtained shall be retained by 360 Behavioral Health in accordance with applicable laws, rules, regulations, and funding source requirements. At no time shall 360 Behavioral Health retain Personal Information longer than is reasonably necessary to achieve the disclosed collection and use purposes.

Selling or Sharing of Personal Information

We do not sell your personal information to third parties and have not sold it in the past 12 months. We do not share your personal information with third parties for cross-context behavior advertising purposes and have not shared your personal information in the past 12 months.

How we Protect your Personal Information

We use commercially reasonable efforts to protect the confidentiality and security of personal information. However, despite these efforts to store personal information in a secure environment, we cannot guarantee the security of personal information during its transmission or its storage on our systems.

Your Rights and Choices under CCPA

CCPA confers the following rights on consumers regarding their personal information:

- The right to know what personal information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer.
- The right to delete personal information that the business has collected from the consumer, subject to certain exceptions.

- The right to correct inaccurate personal information that a business maintains about a consumer.
- If the business sells or shares personal information, the right to opt-out of the sale or sharing of their personal information by the business.
- If the business uses or discloses sensitive personal information for reasons other than those set forth in CCPA §7027(m), the right to limit the use or disclosure of sensitive personal information by the business.
- The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the CCPA.

Contact Information and Exercising Your Rights to Know or Delete

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

Phone: 800-472-9071

Website: www.360behavioralhealth.com

Email: Compliance@360bhmail.com

Postal Address:

360 Behavioral Health
 Attn: Legal & Compliance Department
 16380 Roscoe Blvd., Suite 100
 Van Nuys, CA 91406

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete (subject to certain exceptions and limitations) related to your personal information. You may also make a request to know or delete on behalf of your child or dependent through the above contacts. You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

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

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in the request to verify the requestor's identity or authority to make it. Once we receive your request and confirm your identity, we will disclose to you:

- The categories of:
 - Personal information we collected about you; and
 - Sources from which we collected your personal information.
- The business or commercial purpose for collecting your personal information and, if applicable, selling or sharing your personal information.

- If applicable, the categories of persons, including third parties, to whom we disclosed your personal information, including separate disclosures identifying the categories of your personal information that we:
 - Disclosed for a business purpose to each category or persons; and
 - Sold or shared to each category of third parties (if applicable).
- When specifically requested, a copy of your personal information subject to any permitted redactions.

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation with the 10-day timeframe, please contact (818) 401-0661 and ask to speak to the Legal Department or email compliance@360bhmail.com. We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing. Our response will cover the 12-month period preceding the request, although we will honor requests to cover a longer period that do not extend past January 1, 2022, unless doing so would be impossible or involves disproportionate effort. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

You have the right to request correction of personal information we maintain about you that you believe is inaccurate. We may require you to provide documentation, if needed, to support your claim that the information is inaccurate. Unless an exception applies, we will correct personal information that our review determines is inaccurate and direct our service providers to take similar action.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

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

However, we may offer you certain financial incentives permitted by the CCPA that **can result in** different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Data Security

We have implemented reasonable measure designed to secure your personal information from accidental loss or destruction and from unauthorized access, use, alteration, and disclosure. We also limit access to personal information to those employees, agents, service providers, and contractors that have a legitimate business need for such access.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Intranet, Website, or any company systems, you are responsible for keeping this password confidential. We ask you to not share your password with anyone.

Unfortunately, the transmission of information through the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website or other company systems. Any transmission of personal information is at your own risk. To the extent allowable by applicable law, we are not responsible for circumvention of any privacy settings or security measures contained on our systems.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our website or services following the posting of changes constitutes your acceptance of such changes.**

If you need to access this Notice in an alternative format due to having a disability, please contact compliance@360bhmail.com and/or (800) 472-9071.