

## **Privacy Policy for FFT LLC**

This Privacy Policy governs the privacy terms of our Clinical Service System (CSS) website. We are committed to maintaining the privacy of information stored on our CSS. We are committed to maintaining a proactive approach to the privacy and security of data that is submitted by our client organizations in accordance with HIPAA and GDPR. This privacy policy will explain how our organization uses the personal data about our users and individuals receiving Functional Family Therapy.

### **What information do we collect?**

FFT LLC collects only the information necessary to support fidelity and adherence monitoring and training of FFT users. We collect the user's names and email address and the agency name, address, phone number and email address. We also collect basic demographic information about individuals receiving FFT (including year of birth, gender, race/ethnicity, state and country). We collect assessments from the clients and families to monitor outcomes and progress notes from each session for purposes of fidelity and adherence monitoring.

### **How do we collect information?**

FFT users enter the majority of the data we collect directly into the CSS. FFT LLC enters the initial information noted above about an agency and the user.

### **Who can access the information?**

Permissions are limited to those working directly with an agency providing FFT services, i.e., the FFT user and the agency administration, FFT LLC staff providing training and consultation to the FFT agency, and the FFT LLC data collection and technical assistance staff. FFT agencies can view all the data they provide about their program and request changes as needed.

FFT LLC maintains strict control of access to the CSS. FFT LLC provides users with a link to set up their own personal passwords for the CSS. Once a user has access to the CSS, the user will only have access to the forms and data needed to perform their role in the system. This is accomplished by user privilege control. When a user leaves the organization, FFT LLC inactivates the person's account to prevent unauthorized access.

FFT LLC does not rent, sell, or give this information to any other third party, aside from those noted in this policy. It is possible that at times email messages sent with respect to our services, may contain links or access to websites operated by third parties that are beyond our control. Links or access to third parties from our Services are not an endorsement by us of such third parties, or their websites, applications, products, services, or practices. We are not responsible for the privacy policy, terms and conditions, practices or the content of such third parties. These third parties may send their own Cookies to you and independently collect data. If you visit or access a third-party Website, application or other property that is linked or accessed from our Services, we encourage you to read any privacy policies and terms and conditions of that third party before providing any personally identifiable information. If you have a question about the terms and conditions, privacy policy, practices or contents of a third party, please contact the third party directly. If, in the future, FFT LLC does transfer personal information to a third party acting as an agent on its behalf, our organization shall remain liable under the DPF Principles if it's agent processes such personal information in a manner inconsistent with the DPF Principles, unless FFT LLC proves that it is not responsible for the event giving rise to the damage.

FFT LLC is committed to cooperating with law enforcement while respecting each individual's right to privacy. If FFT LLC receives a request for user account information from a government agency investigating criminal activity, we will review the request to be certain that it satisfies all legal requirements before releasing information to the requesting agency.

## How is the information used?

The information we collect is used to ensure that providers delivering FFT are meeting the quality standards required for certification as an FFT program. The information may be combined to look for patterns across all FFT providers that will help us to continue to improve the delivery of FFT. The information is never shared publicly or used in research unless the individuals receiving FFT have given specific informed consent to participate in the specific research and the FFT agency has authorized the release of the information for that specific purpose.

## How do we store the information?

The FFT server that houses the CSS is hosted at a dedicated colocation center owned by Databank. Databank has a wide array of security tools and capabilities that supports the secure transmission of data. We use third party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to run our products. By contractual agreement, those companies must treat all information in accordance with this Privacy Policy.

FFT LLC retains data to support the FFT program's performance over time, however, you can request, in writing, that your information be deleted at any time.

## How do we use cookies?

We do not utilize cookies on the FFT LLC CSS website.

## Your Rights

- FFT users have the right and ability to download any of the data they provide.
- FFT users can ask us to correct information that they think is incorrect or incomplete that they cannot correct on their own.
- FFT users can ask us to delete information and we will say "yes" to all reasonable requests.
- FFT users can ask us not to use or share certain information for our operations as long as it does not affect the fidelity and adherence monitoring. They can also deidentify any data that they would like to as needed.
- FFT users can complain if they feel we have violated their rights by contacting us using the information below. We will not retaliate for filing a complaint.

## Our Responsibilities

- We are required by law to maintain the privacy and security of protected health information.

- We must follow the duties and privacy practices described in this notice.
- We will not share any information with Third Party vendors.

## Changes to the Terms of This Notice

We can change the terms of this notice, and the changes will apply to all information we have. The new notice will be available upon request on the log on page of the CSS.

## GDPR Compliance

FFT LLC complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce. FFT LLC has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

In compliance with the EU-U.S. DPF, FFT LLC commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF.

FFT LLC is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and it is possible, under certain condition, for an individual to invoke binding arbitration.

In compliance with the GDPR Principles, FFT LLC commits to resolve complaints about our collection or use of personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact FFT LLC at: [holly@fftllc.com](mailto:holly@fftllc.com).

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