# **Privacy Policy**

Naceem Navidi operates the wholeheartedlifetherapy.com website (the "Service").

This page informs you of my policies regarding the collection, use, and disclosure of personal data when you use my Service and the choices you have associated with that data. I am committed to protecting your privacy. I have created this Privacy Policy so that you, the user, will be aware of the uses made of information that may be generated as a result of using my website.

Information Generated When You Visit My Website

Depending upon your use of my website, certain types data may be collected.

#### **Personal Data**

While using my website, I may ask you to provide me with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

## **Email address**

For example, you may give me your email address when you fill out the subscription form for receiving updates. I do not share the Personal Data you submit or store your Personal Data on my website.

#### **Usage Data**

I may also collect information around how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of my Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers, and other diagnostic data.

#### **Tracking Cookies Data**

I use cookies and similar tracking technologies to track the activity on my Service and hold certain information

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze my Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of my Service.

Examples of Cookies I use:

- Session Cookies. I use Session Cookies to operate my Service.
- Preference Cookies. I use Preference Cookies to remember your preferences and various settings.
- Security Cookies. I use Security Cookies for security purposes.

#### **Use of Data**

Any Personal Data that you provide to me will be used by me only to fulfill the stated objective for which the information was requested or collected (e.g. if information is provided as a result of you requesting an appointment, I will use the information, such as your name and email address, to contact you in order to help fulfill your request).

## **Security of Data**

Please be mindful to not include any private health information when filling out forms on my website. Please note that the security of your Personal Data is important to me, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While I strive to use commercially acceptable means to protect your Personal Data, I cannot guarantee its absolute security.

#### **Service Providers**

I may employ third party companies and individuals to facilitate my Service ("Service Providers"), to provide the Service on my behalf, to perform Service-related services or to assist me in analyzing how my Service is used.

These third parties have access to your Personal Data only to perform these tasks on my behalf and are obligated not to disclose or use it for any other purpose.

## **Analytics**

I may use third-party Service Providers to monitor and analyze the use of my Service.

• Google Analytics – Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of my Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about your activity. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page.

#### Children's Online Privacy Protection Act

I am committed to protecting the online privacy of children. In accordance with the Children's Online Privacy Protection Act ("COPPA"), I will not knowingly collect any personally identifiable information from children under the age of thirteen (13). If you are a parent or guardian and you are aware that your child has provided me with Personal Data, please contact me. No one under age 13 may provide any personal information to or on the website. If you are under 13, do not use or provide any information about yourself to me, including your name, address, telephone number, or e-mail address. If I learn I have collected or received personal information from a child under 13 without verification of parental consent, I will delete that information. If you believe I might have any information from or about a child under 13, please contact me.

# California Online Privacy Protection Act (CalOPPA)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law requires a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with

this policy. See more at <a href="http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf">http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf</a>.

My Privacy Policy is linked on my home page and my footer across my website. My Privacy Policy link includes the word 'Privacy' and can be easily found on the page specified above.

# Changes to Privacy Policy Statement

I reserve the right to change this Privacy Policy at any time. As you use my website, I encourage you to periodically visit my Privacy Policy to check for possible updates or changes; changes to this Privacy Policy are effective when they are posted on this page.

Your continued use of my website will constitute your agreement to and acceptance of any changes I make and if you do not agree with a change, please refrain from using the website.

## Contacting Me

If there are any questions regarding this privacy policy you may contact me using the information below.

By phone: 310-905-4896

Social Media Policy

### Social Media

This outlines my office policies as they relate to use of Social Media. Please read it to understand how I conduct myself on the Internet as a mental health professional and how you can expect me to respond to various interactions that may occur between us on the Internet. If you have any questions about anything within this document, I encourage you to bring them to my attention. As new technology develops and the Internet changes, there may be times when I need to update this policy. If I do so, I will notify you in writing of any policy changes and make sure you have a copy of the updated policy.

## Friending

I do not accept friend requests from current or former clients on any social networking site. I believe that adding clients as friends on these sites can compromise your confidentiality and our respective privacy. It may also blur the boundaries of our therapeutic relationship. If you have questions about this, please bring them up when we meet and we can talk more about it.

## Liking

I keep a Facebook Page for my professional practice to allow people to share my blog posts and practice updates with other Facebook users. All of the information shared on this page is available on my website. I encourage you to protect your own privacy and confidentiality by not "liking" my page. You are welcome to view my Facebook Page and read or share articles posted there. Note that you should be able to subscribe to the page via RSS without "liking" it and without creating a visible, public link to my Page. You are more than welcome to do this.

#### Following

I may publish a blog on my website. I have no expectation that clients will want to follow my blog. My primary concern is your privacy. You are welcome to use your own discretion in choosing whether to follow me.

Please Note that I will not follow you back. I do not follow current or former clients on blogs or Twitter. My reasoning is that casual viewing of clients' online content outside of the therapy hour can create confusion in regard to whether it's being done as a part of your treatment or to satisfy my personal curiosity.

In addition, viewing your online activities without your consent and without our explicit arrangement towards a specific purpose could potentially have a negative influence on our working relationship. If there are things from your online life that you wish to share with me, please bring them into our sessions where we can view and explore them together, during the therapy hour.

## Interacting

Please do not use messaging on Social Networking sites such as Twitter, Facebook, or LinkedIn to contact me. These sites are not secure and I may not read these messages in a timely fashion. Do not use Wall postings, @replies, or other means of engaging with me in public online if we have an already established client/therapist relationship. Engaging with me this way could compromise your confidentiality. It may also create the possibility that these exchanges become a part of your legal medical record and will need to be documented and archived in your chart.

If you need to contact me between sessions, the best way to do so is by phone. Texting is second best for quick, administrative issues such as changing appointment times. See the email section below for more information regarding email interactions.

## Use of search engines

It is NOT a regular part of my practice to search for clients on Google or Facebook or other search engines. Extremely rare exceptions may be made during times of crisis. If I have a reason to suspect that you are in danger and you have not been in touch with me via our usual means (coming to appointments, phone, or email) there might be an instance in which using a search engine (to find you, find someone close to you, or to check on your recent status updates) becomes necessary as part of ensuring your welfare. These are unusual situations and if I ever resort to such means, I will fully document it and discuss it with you when we next meet.

#### Business Review Sites

You may find my psychology practice on sites such as Yelp, Healthgrades, Yahoo Local, Bing, or other places that list businesses. Some of these sites include forums in which users rate their providers and add reviews. Many of these sites comb search engines for business listings and automatically add listings regardless of whether the business has added itself to the site. If you should find my listing on any of these sites, please know that my listing is NOT a request for a testimonial, rating, or endorsement from you as my client.

You have a right to express yourself on any site you wish. But due to confidentiality, I cannot respond to any review on any of these sites whether it is positive or negative. I urge you to take your own privacy as seriously as I take my commitment of confidentiality to you. You should also be aware that if you are using these sites to communicate indirectly with me about your feelings about our work, there is a good possibility that I may never see it.

If we are working together, I hope that you will bring your feelings and reactions to our work directly into the therapy process. This can be an important part of therapy, even if you decide we are not a good fit. None of this is meant to keep you from sharing that you are in therapy with me wherever and with whomever you like.

Confidentiality means that I cannot tell people that you are my client, but you are more than welcome to tell anyone you wish that I'm your therapist or how you feel about the treatment I provided to you, in any forum of your choosing.

If you do choose to write something on a business review site, I hope you will keep in mind that you may be sharing personally revealing information in a public forum.

If you feel I have done something harmful or unethical and you do not feel comfortable discussing it with me, you can always contact the Board of Behavioral Science Examiners, which oversees licensing, and they will review the services I have provided.

Board of Behavioral Sciences at 1625 North Market Blvd., 2nd Floor, Suite S200, Sacramento, CA 95834, (916) 5747830 or email <a href="mailto:BBSWebmaster@dca.ca.gov">BBSWebmaster@dca.ca.gov</a> or file a complaint at <a href="mailto:https://www.dca.ca.gov/consumers/complaints/consumer.shtml">https://www.dca.ca.gov/consumers/complaints/consumer.shtml</a>.

#### Location Based Services

If you use location based services on your mobile phone, you may wish to be aware of the privacy issues related to using these services. I do not place my practice as a checkin location on various sites such as Foursquare, Gowalla, Loopt, etc. However, if you have GPS tracking enabled on your device, it is possible that others may surmise that you are a therapy client due to regular checkins at my office on a weekly basis. Please be aware of this risk if you are intentionally "checking in," from my office or if you have a passive LBS app enabled on your phone.

# Email

I prefer using email primarily to arrange or modify appointments. If you agree to be part of my mailing list, I may email you newsletters or notification when new content is available, when applicable. This is not a requirement and this information can also be made available via hard copy. If you would like to email me content related to your therapy sessions, please use the client portal secure messaging, as my regular email may not be secure or confidential. If you choose to communicate with me by email, be aware that all emails are retained in the logs of your and my Internet service providers. While it is unlikely that someone will be looking at these logs, they are, in theory, available to be read by the system administrator(s) of the Internet service provider.