



California Consumer Privacy Act Client Disclosure

Dear Client,

Respecting the privacy of our clients is an essential part of our privacy program. We are committed to the proper handling of the Personal Information collected or processed in connection with your therapeutic service and, if you become a client of Behavior Frontiers, your employment relationship with us. This disclosure describes categories of Personal Information we collect and the purposes for which we process that information in accordance with section 1798.100 (b) of the California Consumer Privacy Act. The CCPA defines Personal Information as categories of information that identifies, relates to, describes or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household.

CLIENTS

In connection with your application for service with Behavior Frontiers, and if you become a Client of ours, we collect certain personal information about you, your family and child and/or children which may include the following categories A-G. While we typically collect this information from you, as a Client of Behavior Frontiers, we may also collect such information from other third parties including references, social media sites, publicly available sources, and service providers.

Categories of Personal Information Collected from Client	
Category A	Identifiers, such as name, contact information, online identifiers, and Social Security numbers and other government-issued ID numbers
Category B	Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history, medical information, and health information. This also includes signature, physical characteristics or description, address, telephone number and email.
Category C	Characteristics of protected classifications under California or federal law, such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and marital status, to the extent you choose to provide this information.
Category D	Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities.
Category E	Professional or employment-related information, such as work history and prior employer
Category F	Inferences drawn from any of the Personal Information listed above to create a profile or summary above, for example, an individual's preferences, abilities, aptitudes, and characteristics.



Category G	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records, highest level of education, schools attended, degrees, etc.
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Personal Information is collected for the following purposes:

1. To comply with state and federal law and regulations.
2. To track time and attendance.
3. To communicate with clients to operate the business, including marketing.
4. To conduct investigations.
5. To obtain and verify background checks as applicable.
6. To implement, monitor, and manage electronic security measures on devices that are used to access networks and systems (e.g., incident management).
7. To engage in corporate transactions requiring review of records, such as for evaluating potential mergers and acquisitions of the Company.
8. To maintain commercial insurance policies and coverages, including other liability insurance.
9. To anonymize and/or aggregate data to perform workforce analytics, data analytics, and benchmarking and budgeting; and

We may collect contact information, and other identifying information from family members to communicate about your case, communicate in the event of an emergency, comply with applicable law, including tax reporting.

If you have any questions about the collection and processing of your Personal Information or about the security of your Personal Information, please contact Human Resources.
