

Integrative Pathways Counseling, LLC

Notice of Privacy Practices:

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.

This Privacy Policy describes Integrative Pathways Counseling, LLC policies and procedures regarding the collection, use and disclosure of your information when you utilize our service, and informs you of your privacy rights, and how the law protects you. We utilize PHI to carry out treatment, payment and health care operations. We also utilize and share your PHI for other reasons as allowed and required by law. By utilizing the services of Integrative Pathways Counseling, LLC, you agree to the collection and use of information in accordance with this Privacy Policy. Integrative Pathways Counseling, LLC is committed to safeguarding the privacy of our clients. This Privacy Policy therefore outlines how Integrative Pathways Counseling, LLC collects, uses and protects information which you provide to us.

PHI is health information that includes your name, email, phone number as well as other identifiers, and is utilized or shared by Integrative Pathways Counseling, LLC. PHI may also include health information regarding substance use disorders. Integrative Pathways Counseling, LLC only collects information necessary to provide and improve services. This information is utilized in furtherance of providing you with treatment and communication with you as the client, as well as payment pertaining to services received. We do not share your personal information with external parties for marketing, or any other purpose. Additionally, no mobile or messaging consent information will be shared with third parties for marketing or promotional purposes. All the above categories exclude text messaging originator opt-in data and consent: this information will not be shared with third parties.

We may utilize or share PHI for the following purposes:

- Integrative Pathways Counseling, LLC may utilize your PHI in furtherance of treatment, and share with other professionals who are treating you.
- Integrative Pathways Counseling, LLC may utilize PHI toward billing for, and receiving of payment for services provided.
- To manage your requests: To attend and manage your requests to Integrative Pathways Counseling, LLC. All messages sent through the service, are stored in the servers. Integrative Pathways Counseling, LLC employs servers and services owned by third parties to retain these messages. These parties [“business associates”] perform different kinds of activities in furtherance of continuity of care.
- To communicate with you by telephone call, SMS, email, or other equivalent forms of electronic communication.
- To provide you with appointment reminders, information regarding care, other mental health related information, paperwork updates, as needed in furtherance of providing mental health services

Additionally, PHI may be shared under the following circumstances:

- Integrative Pathways Counseling, LLC may use or share information as required by law, as mandated by law enforcement, pertaining to a court case or in response to a court order, subpoena, legal process, or other legal review, or to establish or exercise our legal rights, or the legal rights of others, or defend against legal claims, fraud and abuse detection and prosecution programs.
- PHI may be shared with respect to actions to assist us in obeying laws.
- PHI may be shared in furtherance of research.
- PHI may be shared pertaining to public health and safety, when it is necessary in furtherance of prevention of serious and/or imminent threat to the health and safety of a person or the public, or as otherwise required by law.
- PHI may be shared with legal authorities, in accordance to state and/or federal laws requiring such disclosure, including with the Department of Health and Human Services, should such requests be made.

- PHI may be shared with legal authorities pursuant to requests pertaining to victim of abuse and/or neglect.
- PHI may be shared with a coroner, medical examiner or funeral director.
- PHI may be shared pertaining to workers' compensation law enforcement, and other government requests in accordance with the law.

Additional Information Regarding Restrictions on Use and Disclosure: Federal and state laws may require privacy protections which restrict the use and disclosure of types of health information. These laws may protect: mental health, alcohol and substance use disorders, biometric information, genetic information, minors' information, child or adult abuse or neglect including sexual assault, communicable diseases/sexually transmitted diseases, and reproductive health. Integrative Pathways Counseling, LLC will follow the more stringent law, where applicable.

Substance Use Disorder [SUD] Information: Integrative Pathways Counseling, LLC is not a substance use disorder treatment program under federal law [a 'SUD Program']. It is possible that Integrative Pathways Counseling, LLC may receive information regarding clients from a SUD program. It is important to note that Integrative Pathways Counseling, LLC may only disclose SUD information for use in a civil, criminal, administrative or legislative proceeding against you if we have: written consent or a court order accompanied by subpoena or alternative legal requirement which compels disclosure subsequent to parties being provided notice and opportunity to be heard.

Integrative Pathways Counseling, LLC does not share any client data with third parties for marketing, or promotional purposes. Your personal information is kept confidential and is not disclosed to any outside organizations except as is required by law, or with your explicit consent.

You as a client of Integrative Pathways Counseling, LLC clients have the right to:

- Ask Integrative Pathways Counseling, LLC not to share PHI in furtherance of carrying out treatment, with family, friends or other individuals who may be participants of your care. Please note, Integrative Pathways Counseling,

LLC is not required to agree with this request. Such a request is required to be provided in written form.

- Clients have the right to review and receive a copy of PHI held by Integrative Pathways Counseling, LLC. This includes your records. Such a request must be provided in writing. Integrative Pathways Counseling, LLC reserves the right to charge a nominal fee for the copying and mailing of records. In certain cases, Integrative Pathways Counseling, LLC reserves the right to deny request.
- Clients have the right to request an amendment or change to your PHI. Such requests are required to be in writing. Integrative Pathways Counseling, LLC reserves the right to deny such requests. Clients may at their discretion submit a letter disagreeing with said denial.
- Clients have the right to request a list of PHI disclosures through written notice to include: disclosure for treatment or payment, regarding individual's own PHI, disclosures with client authorization, release of PHI through permitted or applicable circumstance or in accordance with the law, PHI released in the interest of national security or intelligence purposes, for the prior six years.

Such requests must be provided in writing, and Integrative Pathways Counseling reserves the right to charge a nominal fee.

Data Retention: Integrative Pathways Counseling, LLC retains personal information only as long as it is necessary in which to fulfill the functions outlined in this NPP and in accordance with the retention period required or permitted by law. We will also retain and use said information in as necessary to comply with legal obligations, resolve disputes and enforce our agreements.

SMS Disclosure: By reaching out to us via SMS, you agree to receive recurring messages from Integrative Pathways Counseling, LLC. Please note: Message and data rates may apply. Message frequency depends upon your interactions and preferences. You can reply STOP to opt-out of future messages. No mobile or messaging consent information will be shared with third parties/affiliates for marketing/promotional purposes. All above categories exclude text messaging

originator opt-in data and consent. This information will not be shared with third parties.

Integrative Pathways Counseling, LLC is required to:

- Keep client PHI Private
- Provide the client with written information pertaining to Privacy Policies pertaining to PHI.
- Provide client with notification in the unlikely event of a PHI.
- Adhere to the terms of this Privacy Policy.

Should you believe your rights and privacy have not been protected, you may file a complaint with the Department of Health and Human Services:

U.S. Department of Human Services
Office for Civil Rights
200 Independence Avenue SW
Washington, DC 20201
[800] 368-1019
OCRMail@HHS.gov

Integrative Pathways Counseling, LLC reserves the right to change and/or update information practices and or policies contained within this document at any time. In the event of a change, clients will be notified in writing, and revised documents will be provided. Said updates and/or revisions will also be available on the Integrative Pathways Counseling, LLC website. Additionally, this Policy is available on our website: <https://www.integrativepathwayscounselingllc.com/>

Should you have any questions regarding this document, please feel free to call or text 240-293-4114.

This Notice of Privacy Practices applies to Integrative Pathways Counseling, LLC.
Effective January 1, 2026