

The Theraplay Institute Privacy Policy

The Theraplay Institute has been the international guardian for Theraplay® since 1971, and a 501(c)(3) not-for-profit corporation since 1995. We are all about “building better relationships”—family relationships through Theraplay treatment, classroom relationships through Sunshine Circles, community relationships through our professional networking and educational services program, international relationships through our chartered affiliates in Finland and our international associations in many other countries.

The Theraplay Institute is dedicated to protecting the privacy of those who engage with the organization and would like to describe how we collect, use, and handle your information when you use our website or other services.

We respect the value of your privacy and will do our best to maintain the confidentiality of information collected in accordance with this policy (hereafter, the “Policy”).

Types of Information We Collect

The Theraplay Institute is an international training headquarters providing Theraplay training and supervision, therapy treatment and research. In its normal course of business, the Institute collects personal information such as names, addresses, contact information, employment history, and educational history and credentials, as well as documents and video files containing confidential client information (hereafter, “Personal Information”). Personal Information is collected through a variety of means, including but not limited to email, through the Theraplay Institute website, online file transfer through a HIPAA-compliant file sharing service such as Citrix Sharefile, Dropbox, Wetransfer.com, etc.

The Theraplay Institute collects Personal Information when consumers visit our website, register for an event, purchase materials, join our Association, subscribe to our newsletter or other electronic notifications, make a donation, or in any other way initiate a transaction with us. Certain information, such as your name, shipping and billing addresses, email address, phone number, workplace information, qualifications and products/services purchased will be collected. In addition, Personal Information is also collected in the course of providing training and therapeutic services to individuals attending our training sessions, participating in our practicum, and/or receiving individual therapy.

Purpose of Information We Collect

We collect information primarily for the purpose of providing information about The Theraplay Institute’s website and the Institute’s products and services, and providing professional development training and supervision, as well as quality control purposes. The information we collect is not used for any other purposes. Only authorized staff have access to Personal Information and they are obliged to respect its confidentiality, with the following exception: Personal Information voluntarily provided for inclusion in The Theraplay Institute online directory will be made available on our website. We do not sell, trade, or rent any Personal Information supplied by you to any third party; however, we may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national

security or law enforcement requirements.

For general visitors to our website, The Theraplay Institute utilizes Google Analytics, which collects anonymized data including page information, browser information, and user information as described below.

- Page information: each time a user visits a page on our website, we collect the URL and title of the page the user is viewing
- Browser information: information collected includes name of the browser being used as well as the type of device on which the website is being viewed
- User information: we collect the user's location from the IP address where the session originated as well as the language noted on the user's browser settings.

When you sign up for our mailing list, we collect your contact information, which consists of name, email address, city, state, and country/province. This information allows The Theraplay Institute to provide electronic announcements that are relevant to you.

When you register for a training or the practicum, The Theraplay Institute stores and uses your Personal Information to verify: (1) completion of each training module; (2) eligibility to become a member of The Theraplay Institute; (3) eligibility to attend advanced level trainings and participate in supervision and practicums; and (4) eligibility for certification and annual recertification.

Credit Card Information

Collection of Information

The Theraplay Institute will collect and use information obtained from credit card transactions only for business purposes. These business purposes include the payment of training or supervision fees, the purchase of supplementary educational or promotional items including books and webinars, and conference registration fees.

Protecting Your Credit Card Information

The credit card information provided by you to The Theraplay Institute will be stored in a confidential manner. Our employees may access such information only when there is an appropriate business reason to do so, such as charging payments or issuing a refund. We maintain physical, electronic and procedural safeguards to protect your information, and our employees are required to follow these privacy standards. We will not disclose any private credit card information to anyone except as required to by law.

Uses of Collected Data

All Personal Information collected through our website and trainings is done in order to provide, improve, and protect our services. Any Personal Information collected through our website may be used for the following purposes:

- To improve website and customer service based on user feedback;
- To detect fraud or abuses of our website (in cases where IP addresses are collected);
- To process payment transactions (for business purposes only, which includes the payment of fees) and provide users with information, products, and services they request on our website;

- For communication purposes, such as periodic emails and emails pertaining to online orders;
- To allow users to participate in online content, access and/or download materials, and use any of the interactive features on the website; and
- To fulfill any other purpose for which you provide your consent.

Third Parties With Whom We May Share Your Personal Information

The Theraplay Institute does not sell, trade, or rent your Personal Information to any third parties. However, we may, in accordance with this Policy, share your Personal Information with the following types of third parties:

- Service providers: this includes our trainers and training assistants who work as employees or contractors for The Theraplay Institute as well as those approved to provide supervision services for training participants.
- Vendors: this includes MailChimp (our email program), Citrix Fileshare and other secure file transfer programs, and our Authorize.net (merchant services) accounts.

We may share your Personal Information with such third parties for the following purposes:

- In order for such third parties to provide services to training attendees;
- For purposes of verifying identity and/or correcting training attendees' Personal Information for communication purposes related to the provision of services; and
- In order to provide clinical supervision and consultation for practicum students and trainees.

The Theraplay Institute will take reasonable steps to ensure that third parties receiving Personal Information are subject by contractual obligations to comply with this Policy.

Data Storage, Retention and Destruction

When individuals contact The Theraplay Institute in the ways stated above, contact information is stored in our database on an encrypted server in a device located in a secure onsite location with automatic backup in a secure encrypted server maintained offsite by our IT company, Great Computer Solutions. Hard copies of information submitted in the training and certification program registration process are stored in locked filing cabinets. Once information in hard copies is no longer needed these hard copies are cross-shredded onsite or offsite by Paper Tiger Document Solutions with a NAID certificate. Digital copies of the information may be retained and archived in a secure online storage account.

Confidential materials including client information and video recordings used for supervision that are sent to The Theraplay Institute are sent through a secure and encrypted file sharing and transfer service (Citrix Sharefile). Files are accessible for 14 days in the online storage service before being automatically destroyed. Except in those cases where videos are retained for training purposes (as set forth below), supervisors delete supervision videos after viewing and providing supervision to the student in the session. Written supervision documentation may be retained in the practicum student's folder in a storage file.

PROVISIONS APPLICABLE TO CALIFORNIA RESIDENTS

1. Accessing, Correcting, or Updating your Personal Information

You have the option to review and/or request changes to your Personal Information collected by The Theraplay Institute. If you would like to do so, please submit a written request including sufficient identifying information to The Theraplay Institute at either the mailing address or email address listed under the **Compliance** section of this document.

2. Opt Out and Choice

Users have the choice of opting out and/or unsubscribing from The Theraplay Institute's emails and mailing lists. You may also request to be removed from our database at any time. Please submit requests to the email address provided under the **Compliance** section of this document. We will respond as soon as is reasonably possible.

3. Do Not Track Disclosure

Currently The Theraplay Institute website does not respond to browser "Do Not Track" settings.

4. Cookies

The Theraplay Institute uses cookies on our website, which enable the site to recognize your browser and capture and remember certain information, including traffic and site interaction. Some cookies support overall functionality of the website. If you prefer, you can disable cookies via your browser settings or have your computer warn you each time a cookie is being sent.

Security of Data and Access

Data is transmitted using a secure and encrypted file sharing service as stated above. Only authorized staff (including contracted staff) have access to personal data on our encrypted servers; such access is exclusively for training and quality control purposes.

Individuals have the right to access their Personal Information upon written request to the address provided in the **Compliance** section of this Policy below. The Theraplay Institute will allow individuals to amend, correct or delete any of their Personal Information in its possession that it is inaccurate or processed in a manner inconsistent with this Policy. Please be aware that individuals wanting to access their information will need to provide sufficient identifying information.

In addition, The Theraplay Institute retains limited registration information related to services provided (e.g. name, contact, and training history) as long as the student is active or as needed to provide services including maintaining yearly certification, as well as for accounting, audit, and compliance purposes.

Personal Information will not be shared with a third party, with the following exceptions:

1. If you choose to be listed in our online therapist directory, we will share the information you provide us for your listing for visitors of our website to contact you directly for services. It is your responsibility to update and monitor this information for accuracy as well as to notify us if you would like for your information to be removed.

Compliance

The Theraplay Institute commits to resolve complaints about our collection or use of your Personal Information. EU, UK, and other individuals with inquiries or complaints regarding our privacy policy should contact The Theraplay Institute at:

Executive Director
The Theraplay Institute
2049 Ridge Ave.
Evanston, IL 60201
Toll-free: 800-884-7914
Telephone: 847-256-7334
Fax: 847-256-7370
Email: info@theraplay.org

Data Security

The Theraplay Institute takes commercially reasonable efforts, precautions and proactive measures to protect your data against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. However, The Theraplay Institute cannot guarantee the security of Personal Information on or transmitted via the Internet, since no internet or e-mail transmission is ever fully secure or error free.

Onward Transfer

The Theraplay Institute does not share your Personal Information with any third parties except to fulfill the purposes for which the information was disclosed or for the purposes outlined in this Policy. For more details, see the section of this Policy entitled "Third Parties With Whom We May Share Your Personal Information." With respect to any Personal Information related to EU or UK individuals, The Theraplay Institute will only provide such information to third parties as consented to and our relevant contracts with our vendors and independent contractors providing us such Personal Information. We will ensure that any third party receiving such Personal Information from us has entered into a written agreement with The Theraplay Institute requiring that such third party provide at least the same level of privacy protection as The Theraplay Institute. The Theraplay Institute is responsible for the processing of Personal Information pertaining to EU and UK individuals that it receives and subsequently transfers to a third party acting on its behalf. The Theraplay Institute remains liable if any such third-party processes such Personal Information in a manner inconsistent with our privacy policy, unless The Theraplay Institute can prove that it is not responsible for the act or event giving rise to the damage.

Data Integrity & Limitations on Data Use

The Theraplay Institute shall only process and use Personal Information in a way that is compatible with and relevant for the purpose for which it was provided. To the extent necessary

for those purposes, The Theraplay Institute shall take reasonable efforts to ensure that Personal Information in our possession is accurate, complete, current and reliable for its intended use.

Opt Out & Receipt of Information from Third Parties

We only give information to third parties for the purposes previously described in this document pursuant to normal business operations. To the extent that TTI determines that information should be shared with some other party for their use that is not on our behalf or pursuant to our specific instructions, we will first offer the individual the ability to opt out.

Where The Theraplay Institute receives Personal Information regarding an EU or UK individual directly from a third party vendor or independent contractor (and not from the individual to whom the Personal Information relates), we will cooperate with our third parties' reasonable requests to:

- Assist them in informing the impacted individuals about: (a) the possibility that we may disclose such individual's information to third parties; and (b) the individual's ability to opt out of such disclosures (except for disclosures to third parties performing tasks directly on our behalf and pursuant to our instructions); and
- Reasonably ensure that The Theraplay Institute processes the information for purposes compatible with those for which it was originally collected or subsequently authorized by the impacted individuals. Our vendors and/or independent contractors will then inform The Theraplay Institute if any such individuals have opted out of such disclosures.

With the exception of mental health/trauma history in a select number of our programs (see paragraph below for detailed information), The Theraplay Institute does not intend to receive any Sensitive Personal Information (which may include information relating to medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the sex life of the individual, ideological views or activities, social security measures pertaining to an individual, or administrative or criminal proceedings and sanctions). Neither our vendors or independent contractors nor any individuals should provide any Sensitive Personal Information to us. We also do not intend to share any such Sensitive Personal Information with third parties.

Information Collected Regarding Mental Health/Trauma History

Where both a practicum student and his/her client have both explicitly provided consent, written and recorded documentation of interactions between student and client may be submitted to individuals employed and/or contracted and approved to provide supervision as part of the practicum level of the training. The purpose of such information is to provide students with an additional learning tool, so they can demonstrate and improve upon the application of the concepts being taught. Except as set forth below, where video may be retained for training purposes, supervisors delete supervision videos after viewing and providing supervision to the student in the session. Written supervision documentation may be retained in the practicum student's folder in a secure storage file.

With written consent of all participants (parent on own behalf, and on behalf of child), video collected during treatment may be retained for use in future Theraplay trainings provided by certified Theraplay Trainers.

Exceptions

The Theraplay Institute's adherences to our privacy policy principles may be limited to the extent necessary to comply with national security, public interest, or law enforcement requirements.

Third Party Links

We may occasionally offer third party products or services on our website. Please be aware that these third-party sites have separate and independent privacy policies and therefore The Theraplay Institute has no responsibility or liability for the content and activities of these linked sites.

Legally Required Disclosures

Please be aware that The Theraplay Institute may be required to disclose Personal Information pursuant to lawful requests (including subpoenas, warrants, and court or government agency orders) made by public authorities or as otherwise required by law.

Changes to our Privacy Policy

The Theraplay Institute reserves the right to amend this policy from time to time. In the event changes are made, we will update the Privacy Policy modification date below. If a revision meaningfully reduces your rights, we will notify you by email so long as you are still on our mailing list.

This policy was last modified on September 28, 2020.