

**The Westlund Center (TWC)
Tele-Mental Health Service Division**

PRIVACY NOTICE

Last updated on August 23, 2026

This **Privacy Notice** describes how The Westlund Center Tele-Mental Health Service Division and its affiliates and subsidiaries (“**TWC**”, “**we**”, “**our**”, or “**us**”) collects, uses, retains and shares personal information when you interact with us through our website, (the “**Website[s]**”), and when you otherwise interact with us, such as via telephone or email and when you engage with our Tele-Mental Health (“**T-MH**”) Service Division (the “**Services**”).

PERSONAL INFORMATION WE COLLECT, HOW WE USE IT, HOW LONG WE KEEP IT, AND HOW WE SHARE IT

When you interact with our Services, we collect your Personal Information. “Personal Information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. We also collect sensitive personal information, which includes your mental health information.

We collect personal information when you:

- **Contact us.** When you email or call us, for example, to ask questions regarding our services, we collect from you, your *personal identifiers* (name, email address, or telephone number) and anything else you choose to include in your message. We use this information to respond to your questions or inquiries or address any issues you have with the Services.
- **Sign up to become a client.** When you sign up to become a client of TWC T-MH, we collect from you, your *personal identifiers* (name, home address, email address, telephone number, California State University, Northridge student ID, and date of birth), and your *sensitive mental health information* (mental health history). We use this information to confirm you are a CSUN student, create and manage your client account, and communicate with you about your care. We also collect from you the *personal identifiers* (name, phone number, and relationship to you) of an emergency contact. We only use this information to contact the person in case of an emergency. You must obtain the consent of your emergency contact to provide us with their information.
- **Interact with our clinicians.** When you interact with our clinicians, we collect from you your *sensitive information* (e.g., information about your mental health, present and historical mental health information, current treatments, and medication), your *professional or employment-related information* (e.g., information about your job, where you work, and title), and any other information you choose to share with your clinician. We use this information to provide you with the Services and assist you with mental health treatment.

- **Aggregate data.** We aggregate the data we collect for benchmarking purposes and for internal analytics. We maintain and use this data in deidentified form. We will not attempt to reidentify the data unless it is necessary to determine whether our deidentification processes satisfy applicable data protection laws.

TWC will also use the personal information we collect as described in this section to comply with the law, to efficiently maintain our business, and for other limited circumstances as described below.

HOW WE SHARE YOUR PERSONAL INFORMATION

TWC shares personal information in the following instances:

- **Within TWC.** We may share your personal information among our mental health professionals, and affiliated entities for the legitimate purposes of efficiently and effectively providing mental health care as part of the Services. Access to your personal information is limited to those on a need-to-know basis. Your provider will be under the supervision of a licensed clinician and may share your information with their supervisor (an LCSW) to ensure you are receiving appropriate care.
- **For legal purposes.** We share personal information where we are legally required to do so, such as in response to court orders, subpoenas, governmental/regulatory bodies, law enforcement or legal process, including for national security purposes. We may share your information with our legal advisors or auditors to establish, protect, or exercise our legal rights or as required to enforce our terms of service or other contracts or to defend against legal claims or demands. We also share this information with third parties as necessary to: detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person; to comply with the requirements of any applicable law; or to comply with our legal obligations.
- **For safety reasons.** Pursuant to our legal and ethical duties, we may share your personal information where we are legally required to do so for your health and safety or for the health and safety of others. This may include scenarios where you present a serious danger to yourself; a serious threat of violence to another person or property; if there is a reasonable suspicion of abuse or neglect of minor children (under the age of 18), dependent children (over the age of 18 in another's care), or elderly persons; if there is a reasonable suspicion you are involved in the creation, viewing, or distribution of obscene material involving minors, including "sexting" a minor; or if you are determined to be gravely disabled and need further assistance.
- **With your consent.** Apart from the reasons identified above, we may request your permission to share your personal information for a specific purpose. We will notify you and request your consent before you provide the personal information or before the personal information you have already provided is shared for such purpose. You may

revoke your consent at any time and may do so by contacting us via email at wgetz@whidbey.com.

- **Business purposes.** We have disclosed your personal information to service providers that assist us in providing the Services. These service providers assist us with the following: information technology (“IT”) support; website hosting; email delivery; and similar services.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

Unless otherwise stated in this Privacy Notice, we retain your personal information as long as reasonably necessary to retain it for the purpose for which it was collected or until we receive a valid request to delete the information, in which case we will delete or anonymize the information after receiving the request (unless there is a reason to retain the information for longer as explained below). This includes maintaining a client account with us (if applicable) or until the information is no longer needed for a service provider or contractor’s operational purpose(s). Tax, audit, and transaction-related records may also be retained for longer where reasonably necessary for accounting, dispute resolution, tax, audit, and legal compliance purposes.

We use the following criteria to determine whether it remains reasonably necessary to retain your personal information for such purposes or a service provider or contractor’s operational purpose(s): (i) whether there is a retention period required by statute or regulations; (ii) the existence of actual or threatened or reasonably anticipated litigation for which we are required to preserve the information; (iii) the statutes of limitations for potential legal claims; and (iv) generally accepted best practices in our industry, including in relation to the safety and security of our properties and assets. When we determine that it is no longer reasonably necessary to retain your personal information based on the above criteria, we will delete or anonymize your personal information.

YOUR INFORMATION CHOICES

You have the following choices with respect to your personal information:

- **Correct or View Your Information.** You may access your account to correct or view certain personal information you have provided to us.

You must provide us with sufficient information that allows us to reasonably verify you are the person about whom we collected the personal information. This may include items like your name, date of birth, phone number, address, and email address and describe your request with sufficient detail to allow us to properly evaluate and respond to it. We will verify your request by matching the information provided by you with the information we have in our records. If we are not able to verify your identity for access and deletion requests with the information provided, we may ask you for additional pieces of information.

Only you, or a person that you authorize to act on your behalf may make a request related to your personal information. If you are an authorized agent making a request on behalf of another

individual, you must provide us with signed documentation that you are authorized to act on behalf of that individual.

DOXY.ME MESSAGING SERVICE

Our Services use the Doxy.me messaging platform for mental health providers to communicate with clients. Doxy.me is a messaging service and protocol that uses end-to-end encryption to provide private messaging and Internet calling services to users around the world. Doxy.me is widely available on different devices, including Windows, Mac, iOS, Android, and Linux. These features make Doxy.me well-suited for communicating with mental health providers and protecting your information.

Clients will need to sign up with Doxy.me to use the Services. For more information on Doxy.me's Terms of Service and their Privacy Policy, please visit [here](#).

THIRD PARTY WEBSITES

Our Website may contain links to third-party websites, services, or resources that we do not operate or control. We are not responsible for the privacy or security practices of those third-party websites. Because third-party websites likely have different privacy practices from TWC, we encourage you to review the privacy notice of any third-party website you visit to understand how it collects, uses, and discloses your personal information.

DO NOT TRACK

We do not respond to Do Not Track requests. Do Not Track is a preference you can set in your web browser to inform websites and mobile applications that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

INFORMATION SECURITY

We implement and maintain appropriate technical and organizational security measures, such as software- and hardware-based monitoring and protection, access controls, firewalls, and encryption (i.e., SSL and HTTPS) to protect the personal information that we collect and maintain from unauthorized access, destruction, use, modification, or disclosure. However, no security measure or modality of data transmission is 100% secure, and we are unable to guarantee the absolute security of the personal information we have collected from you.

CHILDREN'S PRIVACY

The Services are not directed to or intended for individuals under the age of eighteen (18) years. We do not allow registration by, nor do we directly collect personal information from any person we know to be under the age of eighteen (18). TWC does not use personal information for targeted advertising or profiling.

CHANGES TO THIS PRIVACY NOTICE

We may amend this Privacy Notice in our sole discretion at any time. If we do, we will post the changes to this page and will indicate the date the changes go into effect. We encourage you to review our Privacy Notice to stay informed. If we make changes that materially affect your privacy rights, we will notify you by prominent posting on our Websites and/or via email, and obtain your consent, if required.

CONTACT US

If you have any questions or concerns regarding this Privacy Notice, please contact us at:

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