

The following Privacy Policy pertains to non-medical information obtained by CCRM. For information regarding CCRM's HIPAA Notice of Privacy Practices involving patient medical information, please [click here](#). If you have any questions about this Privacy Policy, please contact CCRM's Privacy officer at Privacy Officer at 303-968-1950, ext 500 or at:

CCRM MANAGEMENT COMPANY  
c/o CCRM Privacy Officer  
9380 Station Street  
Suite 425  
Lone Tree, CO 80124

### **CCRM Management Company, LLC Privacy Policy**

Last modified: June 6, 2023

CCRM Management Company, LLC is affiliated with entities across the United States and collectively are referred to in this Privacy Policy as "CCRM," "us," "our," or "we."

This policy is meant to help you understand what personal information we collect, why we collect it, how we treat it, and how you can access and delete your information.

### **What Information Do We Collect?**

You may be asked to provide personal information anytime you interact with us. The types of information we collect depends on how you use our services. The following types of information are collected by or on behalf of CCRM:

- **Contact details (Identifiers).** Your name, address, telephone number, email address, etc.
- **Financial information.** Your bank account number, payment card information, billing address, etc.
- **Medical Information.** Health insurance information; information regarding your previous, current, and future medical condition and/or treatment.
- **Protected Classes.** Race, color, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability status, veteran status, genetic information, gender identity, medical condition, ancestry, and disability.
- **Search Queries.** When you search on our website.
- **Demographic data.** Your age, gender, country, preferred language, etc.
- **Educational information.**
- **Data on how you use our website and your device (Geolocation/Internet Activity Information).** Your IP address, login information, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version, etc.
- **Children's Data.** Our website is directed to and intended for use only by those who are 18 years of age or over. We do not knowingly collect personal information from any person under 18 years of age. If you believe we have the personal information of a person under 18 years of age, please notify us and the personal information will be removed.

## Personal Information Collected From Patients Residing in California

We may collect certain personal information from employees including:

- **Identifiers.** Real name, alias, postal address, email address, social security number, driver's license number, state identification card number, passport number, signature, telephone number, bank account number, health insurance information.
- **Professional or employment-related information.**
- **Educational information.**

## How Do We Collect Your Information?

1. **We collect information from you.**

We may collect and receive information from you, including when you:

- use or access our website, such as when you book an appointment, make an inquiry, create an account, complete an application, or browse our website;
- communicate with us by email, telephone, in writing, or social media; and
- use any of our services;

2. **We collect information automatically when you access our website.**

Like many websites, we may receive and store information generated by your activity and information automatically collected from your browser or device when you use or interact with our website.

3. **We collect information from other sources.**

We may collect and receive information about you from other sources, which may include:

- Other healthcare providers;
- Publicly available sources; and
- Marketing service providers.

## How Do We Use Your Information?

We collect and use your information so that we can operate effectively and provide you with the best experience. We also use the information we collect for the following purposes:

- **Providing our services.** Providing our services; customizing our services to your preferences; and keeping proper records of those inquiries, visits, and services.
- **Receipt of transactions.** Processing your payment and keeping proper records of those transactions.
- **Customer support.** Notifying you of any changes to our services; responding to your inquiries via email, phone, or writing, or social media; investigate and address concerns raised by you; and monitor and improve our customer support responses.
- **Improving our services.** Conducting data analysis and audits; developing new products and services; enhancing our website; improving our services; identifying usage trends and visiting patterns;

conducting customer satisfaction, market research, and quality assurance surveys; determining the effectiveness of our promotions, and meeting contractual obligations.

- **Marketing and promotions.** Sending you emails and messages about news and new promotions, features, products and services, and content.
- **Safety and security.** Using security systems to maintain the safety and security of you and our guests, visitors and employees at our offices.
- **Legal proceedings and requirements.** Investigating or addressing claims or disputes relating to your use of our services; or as otherwise allowed by applicable law; or as requested by regulators, government entities, and official inquiries.

### **How do we share your information?**

We do not sell your name or other personal information to third parties and have not done so in the previous 12 months. We may share the information we collect:

#### **1. Within the CCRM Network of Companies.**

We share information within the CCRM network of companies to help us provide our services or conduct data processing on our behalf.

#### **2. With our service providers and business partners.**

We may provide information to our vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:

- Business associates, contractors, service providers, and other third parties we use to support our business;
- Payment processors and facilitators;
- Cloud storage providers;
- Marketing partners and marketing platform providers;
- Data analytics providers;
- Research partners;
- Consultants, lawyers, accountants and other professional service providers; and
- Insurance and financing partners.

#### **3. With your consent.**

We may share your information other than as described in this policy if we notify you and you consent to the sharing.

#### **4. For legal reasons or in the event of a dispute.**

We may share your information with third parties for legal reasons or in the event of a dispute. This may include, for example:

- In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company;
- To comply with a court order, search warrant, subpoena, or other legal process;

- To comply with legal, regulatory, or administrative requirements of any government or law enforcement authority; and
- To establish or exercise our legal rights and to protect and defend us in connection with any threatened or actual legal action, claim or dispute.

We have shared the following categories of information in the previous 12 months:

- Identifiers
- Protected classes
- Commercial Information
- Internet Activity Information
- Geolocation Data

### **How Long Do We Keep Your Information?**

To the extent permissible by applicable law, we will retain your personal information for such period as necessary and proportionate to satisfy or to fulfill the following:

- the purposes for which that personal information was provided;
- an identifiable and ongoing business need, including record keeping;
- a specific legal or regulatory requirement; and/or
- a requirement to retain records that may be relevant to any notified regulatory investigations or active legal proceedings.

### **Where Do We Store Your Information?**

We process and store personal information inside the United States.

### **How Secure Is Your Information?**

We implement reasonable administrative, organizational and technical safeguards and security measures to protect personal information within our control from unauthorized access, acquisition, disclosure, destruction or alteration, accidental loss, misuse or damage. We regularly review and monitor such safeguards and security measures. Although we take reasonable steps to safeguard personal information, no practices are 100% secure, and we do not guarantee the security of your information.

### **Do We Use Cookies?**

We use tracking tools like browser cookies and web beacons to collect information from you. We collect information about users over time when you use this website or any apps that we may make available on our website. We may have third parties collect personal information this way. Learn more about these tools and how you can control them by clicking [here](#).

### **Your Choices.**

You have the abilities to make the following choices about your personal information.

- **Not provide us with personal information.** If you choose to do this, we may not be able to provide you with our services or respond to any queries you may have.
- **Turn off cookies in your browser by changing its settings.** You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the website; however, certain services may not work effectively.
- **Promotional emails and other marketing material.** You can unsubscribe from marketing material from us at any time by clicking the "Unsubscribe" link contained in the email, or by emailing us at [websitetechsupport@ccrmivf.com](mailto:websitetechsupport@ccrmivf.com).
- Please note that withdrawing your consent to receive promotional emails will not prevent us from sending you administrative communications or legal notices; or emails about changes to our terms, policies, or business practices.

### **Your Rights Under the California Consumer Privacy Act**

Beginning January 1, 2020, pursuant to California Civil Code Sections 1798.100-1798.199, individuals who reside in California who have provided their personal information to CCRM may have the right to:

- Request access to the personal information we have collected about you
- Request disclosure of the personal information we have collected and shared about you
- Request disclosure of the categories of personal information we have disclosed for a business purpose
- Request that we delete your personal information
- Request correction of any incorrect or incomplete personal data we have about you
- Request to limit the use and disclosure of sensitive personal information
- Request to opt-out of the sharing of information we collect about you

### **Your California Privacy Rights – Regarding Direct Marketing**

If you are a California resident, you may request information regarding the disclosure of your personal information to third parties for their direct marketing purposes.

**Shine the Light** - California residents also have the right to request that we provide you with (a) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties. To exercise this right, contact us at the address below.

If you exercise any of these rights you will not be discriminated against in any way.

Beginning January 1, 2020, you may exercise these rights by calling the CCRM Privacy Officer at 303-968-1950, ext 500 or writing to us at:

CCRM MANAGEMENT COMPANY  
c/o CCRM Privacy Officer  
9380 Station Street  
Suite 425  
Lone Tree, CO 80124

If you choose to exercise any of the rights listed above, for the protection of your information, we will verify your identity. Your identity may be verified in any of the following ways:

- Through your patient portal account
- By confirming at least three (3) information points of your information we maintain
- By requesting additional documentation

In certain circumstances you may be able to designate an authorized person to make a request on your behalf. To determine if this applies to you, call the CCRM Privacy Officer at 303-968-1950, ext 500 or write to us at:

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#### **Your Rights Under Canada's Personal Information Protection and Electronic Documents Act**

Individuals who reside in Canada who have provided their personal information to CCRM may have the right to:

- Access information we hold about you.
- Request correction of any incorrect or incomplete personal data we have about you.

You may exercise these rights by calling the CCRM Privacy Officer at 303-968-1950, ext 500 or writing to us at:

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#### **Do Not Track Signals**

Our website is not configured to read or respond to "do not track" settings or signals in your browser headings.

#### **How Will We Notify You of Changes to This Policy?**

We may occasionally update this policy, but we will always update it at least once a year. If we make significant changes, we will notify you of the changes on our website or through other means, such as email.

#### **Other Important Information**

**Contact Us.** Questions, comments and complaints about our data practices can be addressed by calling the CCRM Privacy Officer at 303-968-1950, ext 500 or writing to us at:

CCRM MANAGEMENT COMPANY  
c/o CCRM Privacy Officer



6/6/2023

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