**PRIVACY POLICY**

Summit Family Counseling, Inc. (SFCI) respects the privacy of its members and other visitors to its Web sites (the “Sites”) or use our mobile applications (each an “App”). The Sites and Apps are collectively the “Services.” SFCI strongly believes that if electronic commerce and online activities are to flourish, consumers must be assured that information provided online is used responsibly and appropriately. To protect online privacy, SFCI has implemented the following policy.

SFCI is located in the United States and these are U.S.-based websites. By using these Sites or the Services, you agree to the data collection, use, disclosure and storage practices described in this privacy policy.

**POLICY CHANGES**

If there are material changes to our privacy policies, we will notify you by posting the updated policy on our sites, and for registered users, by sending an email. We reserve the right to modify this privacy policy at any time, so please review this page frequently for any changes. Amendments to this privacy policy will be effective when posted. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted, the changes to any amended or revised privacy policy by your continued use of our services or the sites.

**WHAT INFORMATION DOES SFCI COLLECT?**

In some countries, including in the European Economic Area, this information may be considered personal data under applicable data protection laws:

Most data SFCI collects is used only to help us better serve our members. It is our general policy to collect and store only personal information that our members and visitors knowingly provide.

We collect information from you when you choose to provide it to us.  This may include when you submit a membership application or otherwise join SFCI, request information from us, register for a conference or other event, purchase a product, create an account with us, sign up for newsletters or our email lists, use our Services, submit a rating or review, participate in a survey or promotion, or otherwise contact us.

The information we collect may include your name, address, email address, telephone number, mobile telephone number, geolocation information, photos or videos, user name and, if you are an SFCI customer or member, credit/debit card number or other financial information. If you use a third party service to login, link to us, or communicate with us (such as a social network or third party video chat), we may receive certain information about you from the third party based on your registration and privacy settings on those third party services

**From General Users.** SFCI does not automatically collect any personal information from users browsing its websites. Only aggregate data -- such as the number of hits per page -- are collected. Aggregate data are only used for internal and marketing purposes and do not provide any personally identifying information.

**From SFCI's Members, Conference Registrants, and Other Customers.** To gain access to members-only resources and personalization features on summitfamilynwa.com, members and other users are asked to register and provide some limited information. SFCI and its partners may collect IP address and other specific non-personally identifying information for targeted or interest-based communications. This information is submitted voluntarily. SFCI asks users to provide their name, organization name, business phone, and email. Similar information may be submitted to SFCI through membership applications, conference or seminar registration, publication orders, subscriptions, and contest registrations. Additionally, for some e-mails sent in HTML format by SFCI to its members through its communities and electronic newsletters, SFCI, or our authorized service providers, will collect specific information regarding what the recipient does with that email. For those emails, SFCI will monitor whether a recipient subsequently clicks through to links provided in the message. Other information collected through this tracking feature includes: email address of a user, the date and time of the user’s “click,” a message number, name of the list from which the message was sent, tracking URL number, and destination page. SFCI only uses this information to enhance its products and distribution of those products to its members.

**What About Information About Children?**Protecting children’s privacy is important to us. We do not direct the Services to, nor do we knowingly collect any personal information from, children under the age of thirteen.

**HOW DOES SFCI USE DATA COLLECTED?**

SFCI uses information voluntarily submitted by members and other customers in the following ways:

**SFCI Member Services and Products.** Generally, SFCI and its direct, branches, divisions and affiliates use data collected to improve its own web content; to respond to visitors’ interests, needs and preferences; and to develop new products and services.

**Credit Card Account Information.** When members and customers choose to pay using their credit cards, SFCI submits the information needed to obtain payment to the appropriate third-party payment vendors for the limited purpose of processing your payment. SFCI does not otherwise disclose your credit card information.

**Compliance with Law.** We may provide access to your information, including personal information, when legally required to do so, to cooperate with legal proceedings, to protect against misuse or unauthorized use of our websites, to limit our legal liability and protect our rights or to protect the rights, property or safety of visitors of these websites or the public.

**DATA STORAGE AND RETENTION**

Your personal information is stored on servers in the United States.  You understand and agree that SFCI may collect, use, disclose, and otherwise process the information you provide as described in this Privacy Policy even if you are from an area outside the United States. Your personal information may be disclosed in response to inquiries or requests from government authorities or to respond to judicial process in the United States. We will retain your personal information for as long as it is needed to provide you with the Services, or to fulfill any legal or contractual obligations we may have.

If you are a resident of the EEA: Your personal information will be transferred to and processed in the United States, which has data protection laws that are different than those in your country and may not be as protective. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact SFCI’s data protection officer via [**email**](mailto:office@summitfamilynwa.com).

**HOW DOES SFCI USE COOKIES AND PIXEL TAGS?**

For more information on our use of cookies, click [**here**](mailto:office@summitfamilynwa.com).

**Cookies.** Cookies are files that contain information created by a web server that can be stored on a user’s hard disk for use either during a particular session (“per-session” cookie) or for future use (“persistent” cookie). SFCI and its partners may use cookies to facilitate automated activity, assist you with storing and tracking your passwords, determine appropriate solicitations, and review navigation patterns. Cookies are not used to disseminate personally identifiable information about Users over the Internet or to analyze any information that Users have knowingly or unknowingly provided~~.~~ Users may instruct their Internet browsers to opt out of accepting a “persistent” cookie and rather accept only a “per-session” cookie, but will need to login each time they visit the sites to enjoy the full benefits. If the user declines the attachment of any cookie, the user may not have access to the full benefits of the websites. Registration enables the sites to better determine users’ interest areas and provide the most relevant information.

**Pixel Tags.** We also use “pixel tags” (sometimes called “Internet tags,” “web beacons,” or “clear GIFS”), which are tiny graphic images, on our websites. Pixel tags help us analyze our visitors’ online behavior and measure the effectiveness of our websites and our advertising. We work with service providers that help us track, collect, and analyze this information. Pixel tags on our websites may be used to collect information about your visit, including the pages you view, the features you use, the links you click, and other actions you take in connection with the websites. This information may include your IP address, your browser type, your operating system, date and time information, and other technical information about your computer or device.

Pixel tags and cookies in our emails may be used to track your interactions with those messages, such as when you receive, open, or click a link in an email message from us.

**WHAT PRIVACY ISSUES ARISE WITH LINKS TO OTHER SITES?**

These websites contains links to other websites. SFCI has no control over and is not responsible for the privacy policies or content of such sites. In addition, our privacy practices may differ from those of these other sites. If you provide personal information at one of those sites, you are subject to the privacy policy of the operator of that site, not the SFCI’s privacy policy. Please make sure you understand the other site's privacy policy before providing personal information.

**YOUR CALIFORNIA PRIVACY RIGHTS**

Under California Civil Code, California residents are entitled to ask us for a notice describing what categories of personal information we share with third parties or corporate affiliates for those third parties’, or corporate affiliates’ direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: 5500 Pinnacle Point Drive, Ste 200, Rogers, AR 72758 Attn: Website Privacy Policy or [**email us**](mailto:office@summitfamilynwa.com) with the subject line “Request for California Privacy Information.” Please allow 30 days for a response.

**YOUR RIGHTS AS A VISITOR FROM THE EUROPEAN ECONOMIC AREA (EEA)**

If you are a European resident, our legal basis for collecting and using your personal data or information is to do so with your consent; where we need the personal data or information for performance of a contract, or where the collection and use is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal information in question. If we collected your personal data or information with your consent, you may withdraw your consent at any time.

You also have the right to:

* Access your personal data or information;
* Delete, or request deletion of, your personal data or information;
* Object to or restrict processing of your personal information;
* Request portability of your personal information;
* Complain to your local data protection authority at any time;
* Object to automated decision making; and
* Update your personal data or information.

To withdraw consent or exercise these rights, please:

* [**Contact us by email**](mailto:office@summitfamilynwa.com)

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If we ask you to provide personal data to us to comply with a legal requirement or enter into a contract, we will inform you of this and let you know whether providing us with your personal data is required and if not, the consequences of not sharing your personal data with us.

Similarly, if we collect and use your personal information in reliance on our or a third party's legitimate interests and those interests are not already listed above (see "Information Use" section), we will let you know what those legitimate interests are.

**WHAT MEANS OF REDRESS ARE AVAILABLE?**

If any user suspects SFCI has handled its personal information in a manner that does not comply with this privacy statement, please contact us via [**email**](mailto:office@summitfamilynwa.com)or phone at 479.903-0070. Please include “Web Privacy Policy Question or Comment” in the subject line.

For residents of the EEA, with questions, concerns or requests relating to your personal information, you may contact us via [**email**](mailto:office@summitfamilynwa.com).

February 19, 2020