



Privacy Policy and Consent to Use of Data

IMPORTANT: BY RECEIVING SERVICES FROM HELP ME GROW SOUTH CAROLINA (“HMG SC”), INCLUDING USING HMG SC’S ONLINE SCREENING PORTAL TO ACCESS THE AGES AND STAGES QUESTIONNAIRES (“ASQ”) OR ACCESSING OUR WEBSITE <https://helpmegrowsc.org/> (the “Website”), YOU GIVE YOUR CONSENT TO ALL PERSONAL DATA PRACTICES DESCRIBED IN THE FOLLOWING PRIVACY POLICY, INCLUDING OUR USE AND DISCLOSURE OF YOUR PERSONAL DATA:

Privacy Policy

This Privacy Policy (the “**Privacy Policy**”) describes HMG SC’s current policies and practices with regard to collecting, maintaining, using, protecting, and disclosing personally identifiable information about you and your child (“**Personal Data**”) through our Website and marketing efforts (“**Website and Marketing Personal Data**”) and underlying resources, support, and services regarding childhood development, including information you provide when participating in developmental screening with the ASQ using HMG SC’s online screening portal (collectively the “**Services**” and, such information, “**Personal Health and Screening Data**”). This Privacy Policy applies to Personal Data we collect through interactions with you via phone, email, and text exchange. This Privacy Policy does not apply to Personal Data collected by third parties which is not collected by us, such as a third party to whom we refer you.

Notification of changes to this Privacy Policy

Because of changes in the law and the changing nature of technology, our data practices may change from time to time. If we need to make changes to this Privacy Policy, we will (as soon as practicable) post the changes on our website to notify you. If we make any material changes, we will notify you by email or banner. We encourage you to check this page frequently.

1. Collection of Personal Health and Screening Data

HMG SC collects different types of Personal Health and Screening Data about you. We collect this Personal Health and Screening Data in various ways, including:

- Directly from you when you or your parent or guardian provide it to us; and
- From third parties, such as our referral partners.

1.1. Personal Health and Screening Data from You Directly

We may collect Personal Health and Screening Data and other information directly from you or your parent or guardian when you interact with the Services, such as when you fill out information on the Website, register for the Services, contact us via phone or email, or submit a referral including:

- Your name, birth date, telephone number, email address, mailing address, developmental screening responses and results, health concerns, and other information you voluntarily provide to us.

1.2. Personal Health and Screening Data Received from Third Parties

In some instances, HMG SC may receive Personal Health and Screening Data and/or anonymous data about you from other parties, such as our affiliates, referral business partners, and service providers. That information may be obtained online, offline, or through publicly available resources. We may combine this information with the information you provide, and other data we already have about you.

2. Use of Personal Health and Screening Data

HMG SC may use your Personal Health and Screening Data:

- to connect you with the best possible services in the community to meet the needs of you and your child;
- if you provided your phone number, to message you about the services you have requested;
- in combination with the Personal Health and Screening Data of other HMG SC clients to research, evaluate, and improve the Services;
- to provide you with important communications, such as changes to this Privacy Policy;
- to improve the Services;
- to administer and provide the Services that you request from us;
- for security and monitoring purposes;
- in combination with the Personal Health and Screening Data of others in South Carolina whose data is deposited in the South Carolina Integrated Data System housed at the South Carolina Revenue and Fiscal Affairs Office to:
 - Improve early childhood programs and policy in South Carolina.
 - Research and evaluate the effectiveness of early intervention outcomes for participating children and families.
 - Identify characteristics of programs associated with positive outcomes for children and families; and
- for any other purpose with your consent.

3. Storage and security of your Personal Health and Screening Data

HMG SC stores your Personal Health and Screening Data in two locations:

- 1) The System for Tracking Access to Referrals (“STAR”) is HMG SC’s database for collecting and storing Personal Health and Screening Data used to identify appropriate services, provide service referrals to families and children, and ensure connection to services as a result of referrals made. STAR is a custom application designed solely for the use of Help Me Grow systems nationwide. STAR was developed by Data Silo Solutions (formerly KJMB Solutions) and is hosted in HIPAA cloud-based web and database servers. Data Silo Solutions follows industry standard practices and protocols for privacy and data protection as set forth in their HIPAA compliance statement document in the areas of Technical Safeguards, Physical Safeguards, and Administrative Safeguards to protect the data.

- 2) The South Carolina Integrated Data System housed at the South Carolina Revenue and Fiscal Affairs Office (“RFA”) is the central setting for data storage by a wide array of state and private agencies and organizations, including but not limited to the Department of Social Services, the Department of Health and Environmental Control, the Department of Education, and South Carolina First Steps. RFA follows industry standards for privacy and data protection and is compliant with SCDIS-200 information security and privacy standards set forth by the Department of Administration’s Division of Information Security. The Enterprise Privacy Office of the Department of Administration has been involved with RFA to ensure proper safeguards of citizen privacy.

Although HMG SC cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of data, we are diligent in our efforts to prevent such occurrences.

4. Disclosure of your Personal Health and Screening Data

HMG SC will not sell, share, rent, or otherwise disclose Personal Health and Screening Data that we collect from the Website or the Services to any third party, except under the limited circumstances detailed immediately below or with your consent:

- Parent Companies, Subsidiaries, and Affiliates. We may disclose Personal Health and Screening Data about you to our parent companies, subsidiaries, and affiliates.
- Service Providers & Contractors. To help us provide superior service, your Personal Health and Screening Data may be shared with our service providers, contractors, and other third parties we use to support our business and who will safeguard it in accordance with this Privacy Policy. Such third parties may help us process information, deliver the Services to you, manage and enhance customer experiences, provide customer service, or otherwise assist us in maintaining the Services.
- Health and Community Partners. HMG SC will share your relevant Personal Health and Screening Data, as necessary, with health and other community providers to whom we refer you.
- Research Providers. HMG SC stores its data in the South Carolina Integrated Data System housed at RFA. Third party researchers and evaluators may request to review and/or link HMG SC’s data with other data housed at RFA. HMG SC reviews and approve all requests for data review and release. No personal identifiers such as your name, birth date, telephone number, e-mail address, or mailing address are shared with third party researchers and evaluators.
- Authorized Representatives. If another individual is managing your account with us, such as a parent or guardian, as authorized by you or as a personal representative under applicable law, that person can view all Personal Health and Screening Data about you regarding the Services.
- In the Event of Merger, Sale, Divestitures, or Change of Control. HMG SC reserves the right to transfer Personal Health and Screening Data to a buyer or other successor in interest that acquires rights to that information as a result of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of HMG SC or substantially all of its assets, whether as a going

concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Health and Screening Data held by us about you is among the assets transferred.

- **With Your Consent.** We may share your Personal Health and Screening Data for other purposes pursuant to your consent or at your direction.
- **Other Disclosures.** We may disclose your Personal Health and Screening Data if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) conform to legal requirements and comply with any court order, law, or legal process, including responding to any government, law enforcement, or regulatory request; (ii) enforce the HMG SC Terms and Conditions, other agreements, including between you and us, and any other documents included or referenced therein (all of which are incorporated into and made a part of this Privacy Policy by reference); (iii) fulfill the purpose for which you provide it; (iv) detect, prevent, or otherwise address fraud or security issues; or (v) protect against harm to our, your, or third parties' rights, property, or safety.

5. Collection of Website and Marketing Personal Data

HMG SC collects different types of Website and Marketing Personal Data about you. We collect this Website and Marketing Personal Data in various ways, including:

- Directly from you when you or your parent or guardian provide it to us; and
- Automatically as you navigate through the Website.

5.1. Website and Marketing Personal Data from You Directly

We may collect Website and Marketing Personal Data and other information directly from you or your parent or guardian when you use the Website and Services, including:

- Your name, telephone number, email address, mailing address. For example, when you sign up for our newsletters or other marketing programs.

5.2. Website and Marketing Personal Data Automatically collected when you use the Website

As is standard practice on many websites, we and our third-party service providers may automatically collect data about you when you use the Website. This information is primarily needed to maintain the security and operation of the Website, and for our internal analytics so that we can improve the Website and Services. This information includes the following:

- including IP address, profile information, aggregate user data, cookies, clickstream and browser type

HMG SC uses cookies to store Website visitors' preferences and to record session information, for purposes including ensuring that visitors are not repeatedly offered the same advertisements, to customize newsletter, advertising, and Web page content based on browser type and user profile information, to help track usage to help us understand which parts of the Website are the most popular, where our visitors are going, and how much time they spend there, to make usage of the Website even more rewarding as well as to study the effectiveness of our customer communications and to customize each visitor's experience and provide greater convenience. You may be able to configure your browser to accept or reject all or some cookies or notify you when a cookie is set -- each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences -- however, you must enable cookies from HMG SC in order to use some functions on the Website. Please note that HMG SC allows third party advertisers that are presenting advertisements on some of our pages to set and access their cookies on your computer. Advertisers' use of cookies is subject to their own privacy policies, not the HMG SC Privacy Policy.

5.2.1. Google Analytics

Visitors to the Website may be tracked using Google Analytics and Google Tag Manager. Google Analytics and Tag Manager collects the following types of data from Website visitors: type of web browser used, software manufacture and version number; type of operating system; color processing ability of the users screen; JavaScript support; Flash version; screen resolution; network location and IP address; country, city, state, region, county, or any other geographic data; hostname; bandwidth (internet connection speed); time of visit; pages visited; time spent on each page of the Website; referring website statistics; the website the user came through in order to arrive at the Website; and search engine query used. The Website and Marketing Personal Data collected by Google Analytics is primarily used to optimize the Website for you; however, we may also use this data for marketing purposes.

The Website and Marketing Personal Data that we automatically collect using Google Analytics and Google Tag Manager is shared with Google. For more information on Google's Privacy Policies, visit: <https://policies.google.com/privacy>. You can also opt-out of having your Website and Marketing Personal Data used by Google Analytics by following the instructions located at <https://tools.google.com/dlpage/gaoptout/>.

We also use Google Analytics for Display and Search Advertising and, specifically, Google Analytics Demographics and Interest Reporting, on the Website to help display advertising for products or services that HMG SC thinks may be of interest to you. We will use demographic information we collect through our use of Google Analytics Demographics and Interest Reporting for purposes of performing internal statistical analytics relating to the Website. You can opt-out of receiving interest-based advertisements through the Website, as well as customize the types of advertisements that will be displayed to you through the Website, by following the instructions located at <https://support.google.com/ads>.

5.2.2. Facebook Pixel

We use the "visitor action pixels" from Facebook Inc. on the Website. This allows user specific behavior to be tracked after they have been redirected to the advertiser's website by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, we do not see the Website and Marketing Personal Data of individual users. This data is stored and processed by Facebook. Facebook may link this information to

your Facebook account and also use it for its own promotional purposes, in accordance with Facebook's Data Usage Policy <https://www.facebook.com/about/privacy/>.

You can regulate the collection of your data by Facebook pixel, or to the use of your data for the purpose of displaying Facebook ads by visiting the following address: <https://www.facebook.com/settings?tab=ads>.

6. Disclosure of your Website and Marketing Personal Data

HMG SC will not sell, share, rent, or otherwise disclose Website and Marketing Personal Data that we collect from the Website to any third party, except under the limited circumstances detailed immediately below or with your consent:

- Parent Companies, Subsidiaries, and Affiliates. We may disclose Website and Marketing Personal Data about you to our parent companies, subsidiaries, and affiliates.
- Service Providers & Contractors. To help us provide superior service, your Website and Marketing Personal Data may be shared with our service providers, contractors, and other third parties we use to support our business and who will safeguard it in accordance with this Privacy Policy. Such third parties may help us process information, manage and enhance customer experiences, provide customer service, assess your interest in our products and services, or conduct customer research or satisfaction surveys.
- Advertising Partners. We may share your Website and Marketing Personal Data with third party advertising partners, such as Facebook and Google Display Advertising and Remarketing services. These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks, commonly referred to as "interest-based advertising."
- Authorized Representatives. If another individual is managing your account with us, such as a parent or guardian, as authorized by you or as a personal representative under applicable law, that person can view all Website and Marketing Personal Data about you regarding the Services.
- In the Event of Merger, Sale, Divestitures, or Change of Control. HMG SC reserves the right to transfer Website and Marketing Personal Data to a buyer or other successor in interest that acquires rights to that information as a result of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of HMG SC or substantially all of its assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Website and Marketing Personal Data held by us about you is among the assets transferred.
- With Your Consent. We may share your Website and Marketing Personal Data for other purposes pursuant to your consent or at your direction.
- Other Disclosures. We may disclose your Website and Marketing Personal Data if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) conform to legal requirements and comply with any court order, law, or legal process, including responding to any government, law enforcement, or regulatory request; (ii) enforce the HMG SC Terms and

Conditions, other agreements, including between you and us, and any other documents included or referenced therein (all of which are incorporated into and made a part of this Privacy Policy by reference); (iii) fulfill the purpose for which you provide it; (iv) detect, prevent, or otherwise address fraud or security issues; or (v) protect against harm to our, your, or third parties' rights, property, or safety.

7. Your choices about your Website and Marketing Personal Data

7.1. Marketing

If you no longer wish to receive marketing or information emails, you may choose not to by opting-out by contacting us as specified in the Contact Information section below. All notification emails and HMG SC newsletters also include instructions for opting-out of those communications in the future. This opt out does not apply to information provided to us as a result of a product purchase, warranty registration, product service experience or other transactions.

7.2. Advertising

Ads appearing on the Website may be delivered by HMG SC or one of our web advertising partners. Our web advertising partners may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement. In this way, ad servers may compile information about where you, or others who are using your computer, saw their advertisements and determine which ads are clicked on. This information allows an ad network to deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers only the use of cookies by HMG SC and does not cover the use of cookies by any third-party advertisers.

We and our service providers may use information about your interactions with the Website to predict your interests and select the ads you see on and off the Website. This is known as interest-based advertising. In providing interest-based ads, we follow the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital Advertising Alliance ("DAA"). For more information about interest-based advertising and how you can opt out, visit:

- Digital Advertising Alliance: <http://www.aboutads.info/choices>
- Network Advertising Initiative: <http://www.networkadvertising.org/choices/>

7.3. Do-Not-Track

Many web browsers include a Do Not Track ("DNT") feature or setting that signals your preference not to have data about your online browsing activities monitored and collected. However, there is currently no uniform standard for recognizing and implementing the DNT signals. As such, HMG SC does not monitor or respond to DNT browser requests. If a standard is adopted that we must follow in the future, then we will inform you about that practice in a revised version of this Privacy Policy.

8. Children under the age of 13

The Services are not intended for children under 13 years of age without the consent of a parent or guardian. If you are under 13, do not use or provide any information through the Services or on or through any of its features or programs. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under the age of 13 without parental or guardian consent, please contact us via the Contact Us section below.

9. Links to Third Party Websites

The Website may contain links to third party websites, online services, mobile applications and/or contain advertisements from third parties that are not affiliated with us – and which may link to other website, services, or applications. Please be aware, HMG SC is not responsible for the privacy policies and/or practices on other third-party websites. We do not make any guarantee regarding those third-party website, services, or applications, and we are not liable for any loss or damage caused by the use of such websites. Any data collected by third parties is not covered by this Privacy Policy. When linking to another website, service, or application, you should read the privacy policy stated on that website. This Privacy Policy only governs information collected on the Website or through the Services.

10. Retention Period

We will retain your Personal Data for as long as reasonably necessary to provide the Website and Services, fulfill the purpose(s) for which it was collected, to comply with applicable laws, and for any legitimate and essential business purpose, such as maintaining and improving the Services and Website, making data-driven business decisions about new features and offerings, complying with legal obligations, resolving disputes and to serve our reasonable interests.

11. Contact Information

If you have any questions about this Privacy Policy or the privacy practices of HMG SC, please contact us at: helpmegrowsc@scimha.org