



## **Effective Date**

June 30, 2024

This Privacy Policy describes what information we may collect from you or that you may provide to us when you visit our Website, our practices for how we collect this information, how we use, maintain, safeguard, and disclose this information, as well as ways you can manage or opt out of the collection of certain information.

## **Parties**

Extend Web Services is the owner of the Website found at [www.nextstepnw.com](http://www.nextstepnw.com) (“Website”). All references to “you,” “your,” or “user” shall be construed to mean any user, viewer, or visitor of this Website.

## **Terms of Acceptance**

Please take time to read and understand this document. If you do not agree to our policies and practices, you must not

use our Website. By using or viewing this Website, you agree to our Privacy Policy, [Terms of Use](#), and any supplementary notices or disclaimers posted herein. Do not use or view this Website if you do not agree with any of the terms of our Privacy Policy, Terms of Use, or supplementary notices or disclaimers.

This Website is intended for use by users residing in and accessing from the United States of America and this Privacy Policy is intended to comply with the federal and state laws of the United States. If you are not a resident of the United States, you may not use this Website.

These policies are subject to the laws of the state where you reside. If you are a resident of California, Colorado, Virginia, or Utah, see “Your State Specific Privacy Rights” near the end of this Privacy Policy for state specific rights that may apply to you.

### **Scope of this Policy**

This policy applies to information we collect:

- on this Website
- via e-mail, text and other electronic messages between you and this Website

This policy does not apply to information collected by:

- us offline or through other means, including on any other website operated by Next Step Pregnancy Services or any third party, including through any applications, services, or content linked through our Website, such as those which are governed by their own Privacy Policies.

### **Children Under the Age of 13**

This Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly market our Website or services to children under the age of 13 and do not knowingly collect information from children under the age of 13 without parental or guardian's consent. 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 personal information about a child under 13 has been submitted to us without appropriate authorization, please contact us so that we can delete their information as soon as possible.

### **Cookie Policy**

Cookies are small pieces of data placed on your device when browsing a website in order to enable or support certain functions. Web beacons are small files used for counting the number of users who have visited web pages

or opened an email or for generating other related website statistics.

Our Website uses cookies and other tracking technologies, placed by our web host, Extend Web Services, and by our SEO and advertising partner, Google (Google Analytics, Google Search Console, and Google Ads), for the purpose of improving your experience (such as by remembering certain actions, like if you've already seen and closed an announcement bar), analyzing how our services are being accessed and used, and enhancing our Website's usefulness and reach. See "How Extend Web Services Collects and Processes Data" and "How Google Collects and Processes Data" below for more detailed information.

In most cases, you can restrict or delete cookies via your web browser's settings or preferences pane, although doing so may disable, disrupt, or reset certain Website functions.

### Third Party Cookies

We link to a variety of third-party websites and services from our Website, which may also place cookies on your device when accessed. Any such third-party cookie usage is solely governed by any applicable policies (Cookie Policy, Privacy Policy, etc.) of the third party placing the cookie(s) and is not under the control of Next Step Pregnancy Services. We are not responsible for any disputes, damages, or losses of any kind arising from any third-party cookie usage.

## **How Extend Web Services Collects and Processes Data**

Our Website is hosted by Extend Web Services.

These [functional and required cookies](#) are always used, which allow Extend Web Services, our hosting platform, to securely serve this Website to you.

These Extend Web Services [analytics and performance cookies](#) are used on this Website only when you click “Accept” on our cookie banner.

See [The Extend Web Services Uses](#) and “Other Information Collected by Extend Web Services,” below, for more information on what data is collected and what it is used for.

## **Ways You Can Opt Out of Extend Web Services Data Collection**

You can choose to decline non-essential (analytics and performance) cookies placed by clicking “Decline” in the cookie banner appearing at the bottom of our web pages.

For purposes of clarification: Clicking the “Decline” option on our cookie banner only disables the non-essential cookies placed and in no way indicates that you decline to accept our Terms of Use, Privacy Policy, or Cookie Policy. Your

continued use of this Website constitutes your agreement to our Terms of Use, Privacy Policy, and Cookie Policy.

If you wish to change your selection after closing the cookie banner, you can restore the cookie banner by clearing your browser's cookies and then reloading our home page.

Instructions for clearing cookies from several popular browsers can be found [here](#). Please note that deleting all cookies may negatively impact the performance and functionality of other websites you have visited and deletion of any cookies from your web browser is at your own risk.

### **How Google Collects and Processes Data**

Our Website uses Google Analytics, Google Search Console, and Google Ads. To learn about Google's collection and processing of data, see [How Google Uses Information from Sites or Apps that Use Our Services](#).

For more information on how we use data collected by these Google services, see "Other Information Collected by Google," below.

## **Ways You Can Opt Out of Google Data Collection**

Google provides a browser add-on available [here](#) for users who would like to prevent their data from being used by Google Analytics.

To limit data collection by Google Search Console, you can use a search engine other than Google.

Your Google Ad settings can be customized [here](#).

## **Do Not Track Requests**

Currently, our Website does not respond to “Do Not Track” signals sent by web browsers. If this feature becomes more standardized in the future, we may adjust our policy. You can still opt out of specific cookies and data usage in the ways described above.

## **Payment Processor and CRM**

All payment related information that you provide to us through our Website is passed through to our then current payment processor and CRM (customer relationship management system) for processing. Our web host, Extend Web Services, and our Website do not hold, retain, or have access to such payment related information.

## **Links to Third Party Services and Websites**

Our Website includes links to numerous third-party services (e.g. standupgirl.com, social media integrations, embedded content such videos, and donation forms) and websites. Your use of any third-party service or website is at your own risk and governed by the Privacy Policy, Terms of Use/Terms of Service, and any other applicable policies or agreements of each respective third-party service or website. Next Step Pregnancy Services is not liable for any data breaches, security and privacy vulnerabilities, or any other losses or damages of any kind arising from your use of any third-party services or websites. To better understand how third-party services and websites may collect, store, or share information you submit to them and/or information or data which they may otherwise automatically collect, please refer to the Privacy Policy and any other relevant policies provided by each respective service or website.

## **Google Maps**

To provide you with directions to our clinic, our Website links to Google Maps, which is subject to both the [Google Maps/Google Earth Additional Terms of Service](#) and the [Google Privacy Policy](#). We do not receive any information about your location from your use of Google Maps.



## **Patient Feedback**

We receive written feedback from our patients via patient surveys submitted to us directly in our clinic as well as via patient reviews submitted through public sources such as Yelp and Google Reviews. With patient consent, we may share feedback from our patient surveys, in whole or in part, on our Website and/or social media accounts, for the purpose of marketing and promoting our clinic and services. We may also share reviews from our patients posted on any public Website, in whole or in part, on our own Website and/or social media accounts, for the same purpose of marketing and promoting our clinic and services. We do not share patients' contact information when sharing their feedback.

## **Email Subscriptions**

If you are subscribed to our email list, you may unsubscribe at any time by clicking the Unsubscribe link at the end of any regular, automated email from us, or click Manage email preferences to update your email preferences.

## **Types of Personally Identifiable Information Next Step Pregnancy Services (NSPS) May Collect**

Personally identifiable information (PII) is information about you that can be used to identify you, either on its own (such as a social security number) or as a necessary complement to other information (such as a physical address paired with a first and last name), that is collected from you online and maintained in an accessible form.

Our Website may collect the following PII, in the following ways, for the purpose(s) given below:

- Your first and last name, email address, phone number (optional), billing address, and credit card information, when you make a donation to us via credit card using the [donation form](#) embedded on our Website. This information is passed through directly to our payment processor and customer relationship management (CRM) system and is not stored by Extend Web Services. We collect only the information necessary to process your payment and send you confirmation and receipts through email. Submission of your phone number is optional. If you include your phone number, we may call you to learn more about your interest in Next Step Pregnancy Services.
- Your IP address, if you visit our Website, via Website analytics cookies used for the purposes described

within our Cookie Policy. Note: while Extend Web Services analytics cookies can retrieve user IP addresses, we do not currently make use of this function, though we reserve the right to do so.

We may collect the following PII via email, in the following ways, for the purpose(s) given below:

- Your email address and first and last name, if you send us an email for any reason, such as to ask us a question. We may keep this information for the purpose of replying to you and for keeping track of our correspondence over time.
- Other PII as described in other parts of this section of our Privacy Policy, such as any details concerning your medical history, your phone number, or other personal information, in the event that you choose to share it with us via email.

Note: because many email accounts do not use secure, end-to-end encryption of data, we recommend not sharing any information you regard as sensitive or private and rather meeting with our medical personnel in a secure appointment setting. Any information you send us through email is strictly at your own risk. By sending us PII through email, you assume all liability for any and all kinds of losses or damages you incur in the event that your email message is intercepted or hacked, either in transit or after its receipt,

regardless of the source, cause, and target of its interception or hacking.

By emailing us PII, you also consent to the incorporation by us of said PII into our EMR (electronic medical record) system (eKyros) as necessary in order to book an appointment for you, maintain your patient and appointment records, and/or fulfill any other obligation or need pertaining to your correspondence with us or to any past, current, or prospective appointment.

- Your first and last name, contact information (such as phone number, email address, and physical address), educational and professional history, and any other PII you elect to include within your resume and/or cover letter, if applying to one of our [career](#) or [volunteer](#) positions.

Please refer to Submission of Feedback within our Terms of Use for additional relevant information.

### **Additional Collection of Personally Identifiable Information by Third Party Websites or Services Utilized by Next Step Pregnancy Services (NSPS)**

Our appointment and patient intake system (eKyros) collect the following PII from you, in the following ways, and share it with authorized medical and administrative staff members at NSPS for the purpose(s) given below:

Please also review How We Safeguard Your Information, below, for further important details.

- Your first and last name, date of birth, home or other physical address, email address, and phone number (as well as other information not universally classified as PII, such as your gender), when you submit an appointment request through our “contact us” form. We use this information to identify you; to create, maintain, and locate your appointment and patient records; to respond to certain communications sent to us by you; and to send you certain communications, including but not limited to notifications about lab results and appointment scheduling, telephone follow ups concerning your appointment, and other information which may be relevant.
- Your medical history (as well as other information not classified as PII, such as medications you are taking), when you submit our eKyros mobile intake forms prior to an appointment. We use this information to understand, assess, and respond to your healthcare needs (in short, to deliver our services to you) when you consult us, whether in our clinic through an appointment or by other means (such as via secure email or over the phone).

## **Other Information Collected by Extend Web Services**

This Website is hosted by Extend Web Services. Extend Web Services collects personal data when you visit our Website, including:

- information about your browser, network, and device
- web pages you visited prior to coming to this Website
- web pages you view while on this Website
- your activity on this Website, such as clicks and searches
- your IP address

Extend Web Services needs the data to run this Website, and to protect and improve its platform and services. Extend Web Services analyzes this data in a de-personalized form. Extend Web Services also uses this data to provide us with website analytics, so that we may learn about our Website traffic and activity and make improvements to our Website and services.

## **Other Information Collected by Google**

Our Website uses Google Analytics, Google Search Console, and Google Ads so that we may further learn about our Website traffic and activity, make improvements to our Website and services, and advertise our services online.

We use the Demographics and Interests Reporting feature of Google Analytics to gain insight into the age, gender, and interests of our users, for the purpose of better understanding our user base and/or better targeting our advertisements.

We may use Google's AdWords Remarketing feature, which collects user behavior, demographic, and interest data to allow for the placement of targeted advertisements of our organization and services on other websites after users leave our Website.

### **How We Safeguard Your Information**

Communications between you and the server hosting this Website are encrypted through the use of SSL technology. Access to all protected health information is protected under HIPAA and HIPAA shall govern the use and sharing of all such information. Access to other information collected through our Website is restricted to authorized employees, volunteers, contractors, and service providers of Next Step Pregnancy Services only.

We do not share your information with any other individual, company, or organization, except

- as necessary to fulfill or provide you with services you have requested or consented to;

- as required by law, subpoena, or other judicial, arbitral, or other quasi-judicial process;
- as necessary to respond to fraud, other illegal activity, threats to the security of our Website, clients, or personnel, or breach of our Terms of Use or other policies;
- in cases where you have otherwise given your consent, such as authorizing us to share your name, date of birth, contact information, and details of your NSPS appointment with another healthcare provider; and/or
- as part of a business transaction for the sale, merger, refinancing or reorganization of our business.

Except as provided above, we do not sell your information to anyone and take all reasonable, necessary, and required measures to keep your information secure. Nevertheless, no method of data transmission or storage can be guaranteed to be 100% secure and all information you submit to us is at your own risk. NSPS is not liable for any data breaches, security and privacy vulnerabilities, or any other losses or damages of any kind arising from your use of our Website, our Website's collection of information, or your submission of information through our Website or email.



## **Your State Specific Privacy Rights**

If you are a California, Nevada, Colorado, Virginia, or Utah resident, your state's laws may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit <https://oag.ca.gov/privacy/ccpa>. California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email or write to our Privacy Officer using the contact information provided at the end of this Privacy Policy.

Colorado, Virginia and Utah each provide their state residents with rights to:

- confirm whether we process their personal information
- access and delete certain personal information
- data portability
- opt out of personal data processing for targeted advertising and sales

Colorado and Virginia also provide their state residents with rights to:

- correct inaccuracies in their personal information, taking into account the information's nature processing purpose
- opt out of profiling in furtherance of decisions that produce legal or similarly significant effects

To exercise any of these rights, please email or write our Privacy Officer using the contact information provided at the end of this Privacy Policy. To appeal a decision regarding a consumer rights request, you may write to our Privacy Officer within 45 days of any rejection. If our Privacy Officer still denies your request, you may submit a complaint to the Attorney General of the state where you reside.

Nevada provides its residents with a limited right to opt out of certain personal information sales. Residents who wish to exercise this sale opt out right may submit a request to our Privacy Officer using the contact information found at the end of this Privacy Policy. However, please know we do not currently sell data triggering that statute's opt out requirements.

### **Additional Information for California Users**

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA), including the right to request access to or deletion of your

personal information, and information about our data practices, as well as the right not to be discriminated against for exercising your privacy rights. To exercise such rights, please contact our Privacy Officer using the information provided at the bottom of this Privacy Policy.

The CCPA sets forth certain obligations for businesses that “sell” personal information. Based on the definition of “sell” under the CCPA and under current regulatory guidance, we may have sold the following categories of information about you in the past twelve months: Identifiers (such as name, address, email address, IP address, or device identifiers); internet or other network or device activity; geolocation information; professional or employment related data; potentially protected classifications (such as gender, nationality, and age); physical characteristics or description (such as when you voluntarily submit a photo to our Site or Application); inferences related to the information identified.

### **International Transfer and Storage of Information**

We manage our Website content and data submitted and received through our Website within the State of Washington, USA. Information you share with us or that is collected by cookies on our Website may be transmitted through or stored on servers outside of the United States, depending on where you access our Website from and the

location and usage of servers employed by our web host and other service providers (e.g. payment processors, email host, patient portal provider, etc.). By using our Website, you consent to any possible transmission or storage of your information both within and outside of the United States.

### **Updates to Our Privacy Policy and Terms of Use**

We reserve the right to update our Privacy Policy and Terms of Use at any time and without prior or express notice. The “Effective Date” at the top of our Privacy Policy or Terms of Use page will be updated to reflect the most recent date of revision. By your continued use of our Website following any such updates, you agree to be bound by any such changes. You are encouraged to review our Privacy Policy and Terms of Use periodically.

### **Reviewing and Editing Your Information**

If you have donated to NSPS and wish to add, update, or remove information we have on file for you, please call (425) 329-4569 between the hours of 10 am and 5 pm, Monday through Friday.

## **How to Contact Us**

We welcome your feedback. If you have any questions, comments, or concerns about our Privacy Policy or other Website policies, please email us at [info@nextstepnw.com](mailto:info@nextstepnw.com) with the subject line, "Attn: Privacy Officer," or write to us at:

Next Step Pregnancy Services  
Attn: Privacy Officer  
19526 – 64<sup>th</sup> Ave. West  
Lynnwood, WA 98036

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## **NEXT STEP PREGNANCY SERVICES CONSUMER HEALTH DATA PRIVACY NOTICE**

This Washington Consumer Health Data Privacy Notice supplements the information in the Clinic's Privacy Policy and applies only to personal information defined as "Consumer Health Data" subject to the Washington My Health My Data Act ("MHMDA"). In the event of a conflict between any other policy, statement, or notice and this Policy, this Policy will prevail as to Consumer Health Data.

### **What Does This Privacy Notice Cover?**

This Notice describes what Consumer Health Data we collect, how we collect and use it, who we disclose it to and why, and the choices you may have regarding our use or

disclosure of your Consumer Health Data. This Notice only applies to Consumer Health Data, which under the MHMDA means personal information that is linked or reasonably linkable to a consumer and that identifies the consumer's past, present, or future physical or mental health status. Examples of consumer health data are provided below.

### **What Is Not Covered in This Privacy Notice?**

This Notice does not apply to any personal information other than Consumer Health Data subject to the MHMDA. Consumer Health Data does not include information generated by your interactions with us that does not identify your health status.

Consumer health data also does not include publicly available information or personal information that has been deidentified. To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information.

### **What Categories of Consumer Health Data Do We Collect?**

We may collect or receive the categories of consumer health data listed below. Not all categories will be collected or received for every individual.

- Information identifying a health condition, treatment, disease, or diagnosis.
- Information identifying a health-related surgery or procedure.
- Information identifying medication used to treat an identifiable health condition.
- Information identifying bodily functions, vital signs, or symptoms.
- Measurements of the information listed above.
- Information identifying diagnoses or diagnostic testing, treatment, or medication.
- Reproductive or sexual health information.
- Biometric data.
- Information identifying precise location, if that information could reasonably indicate an attempt to acquire or receive health services or supplies.
- Information that identifies an individual's intention to seek health care services.
- Information that we derive or extrapolate from data that is not consumer health data, and then use to associate an individual to the information listed above.

## **What Are the Categories of Sources From Which We Collect Your Consumer Health Data?**

We do not collect your Consumer Health Data unless you voluntarily provide it to us. We collect personal information, including Consumer Health Data, from the following categories of sources:

- Directly from you or an authorized member of your household.
- From a device associated with you or an authorized member of your household.
- From websites and mobile applications and automatically from devices you use to connect to our Services. For more information about this, please see our Privacy Policy and Terms of Use.
- From third-party sources including other medical providers and contracted service providers. We may engage third-party service providers to provide certain interactive features. By using these features, you understand that our vendors may process the information obtained through the feature to provide services on our behalf.



## **What Are the Purposes for Collecting Your Consumer Health Data?**

We may collect and use Consumer Health Data as provided below:

- To provide you with the services you have requested or authorized.
- To fulfill our legal functions or obligations, such as maintaining and auditing compliance.
- To ensure security and integrity of our systems, including detection and prevention of security incidents.
- To detect or prevent harmful behavior such as identity theft, fraud, harassment, or deceptive activities, or activities that are illegal under applicable law.
- For other purposes with your consent, such as advertising or marketing purposes.

Where we require your consent to collect personal information for a specified purpose, a description of those purposes is provided to you at the time of collection.

## **What Categories of Consumer Health Data Do We Share?**

We may share each of the categories of consumer health data described above.

## **Who Do We Share Your Consumer Health Data With and Why?**

We will only share your Consumer Health Data with employees and trusted partners and only for the services you have consented to or to the extent necessary to provide a service that you have requested or to comply with applicable law. All such third parties are prohibited from using your Consumer Health Data except to provide these services to us and they are required to maintain the confidentiality of your Consumer Health Data.

As necessary for the purposes described above, we may share personal information, including Consumer Health Data, with following categories of third parties:

- Service providers. Vendors or agents (“processors”) working on our behalf may access Consumer Health Data for the purposes described above.
- Business partners. We may share Consumer Health Data with other companies, for example, where you use our services to interact with another company.
- Financial institutions & payment processors. When you make a purchase or enter into a financial transaction, we will disclose payment and transactional data to banks and other entities as necessary for payment processing, fraud prevention, credit risk reduction, analytics, or other related financial services.

- Government agencies. We disclose data to law enforcement or other government agencies only when we believe doing so is necessary to comply with applicable law or respond to valid legal process.
- Other third parties. In certain circumstances, it may be necessary to provide data to other third parties, for example, to comply with the law or to protect our rights or those of our patients.
- Other users and individuals. If you use our services to interact with other users of the services or other recipients of communications, we will share data, including Consumer Health Data, as directed by you.
- The public. You may select options available through our services to publicly display and disclose certain information, such as an endorsement, demographic data, or other data, which may include Consumer Health Data.

## **How to Exercise Your Rights**

MHMDA provides certain rights with respect to Consumer Health Data, including the right to (1) request access to your Consumer Health Data; (2) confirm whether we have disclosed or sold your Consumer Health Data; (3) delete your Consumer Health Data; or (4) withdraw your consent or authorization relating to such data, subject to certain exceptions. You may exercise any of your rights by

contacting us directly using the contact information below. The written request should include sufficient information to verify your identity and specify the right you wish to exercise. For any questions or assistance, you may also reach out using the contact information below.

If your request to exercise a right under the MHMDA is denied, you may appeal that decision by contacting us directly using the contact information below. If your appeal is denied, you may raise a concern or lodge a complaint with the Washington State Attorney General at [www.atg.wa.gov/file-complaint](http://www.atg.wa.gov/file-complaint).

### **Contact Information**

All notices or requests should be written and given by email and first-class mail to:

Next Step Pregnancy Services  
19526 – 64<sup>th</sup> Ave. West  
Lynnwood, WA 98036

[info@nextstepnw.com](mailto:info@nextstepnw.com)

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