

Privacy Policy

This Privacy Policy is effective as of and was last updated on March 1, 2021.

I. General

This privacy policy ("Privacy Policy") is designed to inform you about the type of information that Victory Recovery Partners ("we", "us", "our", or the "company") may gather or collect from you in connection with your use of <https://www.victoryrp.com> (this "Site" or "Website"). It also explains the conditions under which we use and disclose that information, and your rights with respect to that information.

We may modify this Privacy Policy at any time. If we decide to change this Privacy Policy, we will post those changes on our Website. We encourage you to periodically review our Privacy Policy to stay informed about how we are using the information we collect. All additions and changes apply as of the time they are posted on this Site.

This Site is not intended for use by individuals under the age of 18. By using this Site or submitting information to us, you consent to our collection, use and sharing of information as described in this Privacy Policy. If you are not 18 years of age or older or you do not agree with the terms of this Privacy Policy, do not provide us with any information or use any of the services offered or provided on this Site. We do not direct the Site to, nor knowingly collect any personal information from children under the age of thirteen.

II. Gathering, Use and Disclosure of Information

We collect both Non-Personally Identifying Information and Personally Identifying Information from you. "Non-Personally Identifying Information" is information that, without the aid of additional information, cannot be used to identify you as an individual. "Personally Identifying Information," by contrast, is information such as a first and last name, telephone number, or email address that can be directly associated with a specific person or entity.

A. Non-Personally Identifying Information

1. Gathering Non-Personally Identifying Information

Web Browsers, depending on their settings, gather Non-Personally Identifying Information from you. That information includes your Internet Protocol ("IP") address, operating system and browser type, and the locations of the web pages you view right before arriving at, while navigating, and immediately after leaving this Site.

2. Cookies & Tracking Information

A "Web Cookie" is a string of information that a website stores on your computer, and your browser provides to this our Site, each time you search this Site. Like many other commercial websites, Victory Recovery Partners or one of our third-party vendors, including Google, use Web Cookies to track the pages that you visit during each Site session. Both to help us improve your experience and to help us understand how this Site is being used and to inform, optimize, and serve ads based on someone's past visits to the Site.

If you prefer not to receive cookies while browsing our Website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser, although you may not be able to take full advantage of our Website if you do so.

3. *Use of Non-Personally Identifying Information*

Victory Recovery Partners will analyze Non-Personally Identifying Information gathered from users of this Site to help us better understand how this Site is being used. By identifying patterns and trends in usage, we are able to better design this Site to improve your experiences, both in terms of content and ease of use. The basic information we collect and use in includes the following:

- The date and time of your visit to our Website
- The pages and documents you viewed on our Website
- The URL of the website you visited prior to ours
- The type and version of your Web browser and operating system
- Your location at the time of your visit, down to the city-level

4. *Disclosure of Non-Personally Identifying Information*

The Non-Personally Identifying aggregate data that is collected is only available to the Company's internal Business Development team and Executive Team.

B. Personally Identifying Information

1. *Gathering of Personally Identifying Information*

We collect personal information from you when you provide it to us.

Submitting Personally Identifying information is voluntary and is not required to use this Site. This information may include, for example, your name, date of birth, zip code, phone number, and email address.

2. *Use of Personally Identifying Information*

If you choose to provide Victory Recovery Partners with Personally Identifying Information (for example – by submitting a “Contact Us” form, “Get Help Now” form, requesting an appointment, or completing a survey) we may use your Personally Identifying Information in the following ways:

- i. To respond to your request for help or further information about our services
- ii. To schedule you an appointment
- iii. Send you newsletters or updates about the Company
- iv. Send you marketing communications
- v. Respond to your questions and concerns
- vi. Improve our Site and marketing efforts.

3. *Disclosure of Personally Identifying Information to Third Parties*

We may disclose Personally Identifying Information in the following circumstances:

- i. To our related companies and service providers in which we have entered a formal Business Associates Agreement as defined by HIPAA and 42 CFR Part 2, to perform a business, professional or technical support function for us;
 - ii. As necessary if we believe that there has been a violation of the Website Terms of Use or of our rights or the rights of any third party;
 - iii. To respond to legal process (such as a search warrant, subpoena or court order) and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and
 - iv. In the event that our Company or substantially all of its assets are acquired, your personal information may be one of the transferred assets.
 - v. We may also disclose your personal information with your express consent for other purposes not listed here.
4. We may share aggregate, Non-Personally Identifiable information about Website users with third parties listed below:
- i. We advertise utilizing Google Analytics features, Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager integration, or Google Analytics Demographics and Interest Reporting, Google products (e.g. but not limited to YouTube, Google Maps, Google My Business, Google Web fonts, and Webmaster Tools) and Facebook. Using the Ads Settings link (Google.com), users can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads.

III. Opt-Out Rights

All users or prospective users of this Site have the right at any time to cease permitting personal information to be collected, used, or disclosed by Victory Recovery Partners and/or by any third parties with whom the Company has shared and/or transferred such personal information. These Opt-Out Rights may be exercised by contacting Victory Recovery Partners via email at info@victoryrp.com, by telephone or via certified mail. After processing an Opt-Out request, Victory Recovery Partners will delete the user or prospective user's personal information from its database. All users have the option to unsubscribe from any Victory Recovery Partners marketing communication email by clicking "unsubscribe" link at the bottom of the email.

IV. Website Security

Victory Recovery Partners safeguards the security of the collection, transmission, and storage of the information we collect. In certain areas of our Website, we use industry-standard TLS-encryption to enhance the security of the data transmitted. Victory Recovery Partners uses software programs to monitor traffic to identify unauthorized attempts to upload or change information or other types of malicious

use. Information collected from these sources may be used to help identify and individual in the event of a criminal investigation or as otherwise required by law.

V. HIPAA and 42 CFR Part 2 Compliance

Victory Recovery Partners complies with HIPAA and 42 CFR Part 2 regulations. For questions related to protected health information (PHI), please contact our Privacy Officer via the general inbox info@victoryrp.com.

VI. Links to Other Web Sites.

This Site may contain links to other web sites owned and controlled by third parties. Victory Recovery Partners is not responsible for the privacy practices or the content of those other websites.

VII. Limitations on Liability

YOU ASSUME ALL RISKS ASSOCIATED WITH DEALING WITH OTHER USERS WITH WHOM YOU COME IN CONTACT THROUGH THIS SITE. NONE OF THE CONTENT ON THIS SITE IS INTENDED TO BE USED AS MEDICAL ADVICE WITHOUT FIRST CONSULTING A QUALIFIED PHYSICIAN. WE EXPECT THAT YOU WILL USE CAUTION AND COMMON SENSE WHEN USING THIS SITE.

VICTORY RECOVERY PARTNERS WILL EXERCISE ALL REASONABLE EFFORTS TO SAFEGUARD THE CONFIDENTIALITY OF OUR USERS' PERSONAL INFORMATION. HOWEVER, TRANSMISSIONS PROTECTED BY INDUSTRY STANDARD SECURITY TECHNOLOGY AND IMPLEMENTED BY HUMAN BEINGS CANNOT BE MADE ABSOLUTELY SECURE. CONSEQUENTLY, VICTORY RECOVERY PARTNERS SHALL NOT BE LIABLE FOR UNAUTHORIZED DISCLOSURE OF PERSONAL INFORMATION DUE TO NO FAULT OF VICTORY RECOVERY PARTNERS INCLUDING, BUT NOT LIMITED TO, ERRORS IN TRANSMISSION AND UNAUTHORIZED ACTS OF VICTORY RECOVERY PARTNERS EMPLOYEES, STAFF AND/OR THIRD PARTIES.

VIII. Additional Information

Any questions regarding this Privacy Policy should be directed to info@victoryrp.com.