

# ZERO TO THREE: National Center for Infants, Toddlers and Families

## Welly Privacy Policy

**Effective Date: March, 2019**

Your privacy is important to us, and it is the policy of ZERO TO THREE: National Center for Infants, Toddlers and Families and its affiliates (“ZTT”) to respect your privacy regarding any information we may collect while operating our website (and any related sites at [www.zerotothree.org](http://www.zerotothree.org) (the “Website”) and any mobile applications we may offer (the “Mobile App”). The Website and the Mobile App provide an online or digital platform to enable healthcare providers and family members, including family care givers, to manage a child’s development through ZTT’s HealthySteps Program, and shall be referred to collectively as the “Services” This Privacy Policy discloses how we collect, use, communicate, disclose, and make use of personal information of users of our Services, whether through the Website or our Mobile App (“Users”), and applies solely to the information that we collect through the Services. This Privacy Policy does not address personal information that you provide to us in other contexts (e.g., through a business, patient, or other relationship not handled through the Services).

### Acceptance of Privacy Policy

By using the Services, you signify your acceptance of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Services. Your continued use of the Services following the posting of changes to these terms will mean that you accept those changes.

### How We Collect Your Personal Information

The Services may be accessed by (1) the family member (a “Family Member”) of a patient who is a minor and a child (a “Patient”), (2) a healthcare provider treating the Patient (a “Provider”), or (3) a family advocate affiliated with a governmental agency (an “Advocate”). Collectively, Family Members, Providers and Advocates are referred to as “Users.” We collect your personally identifiable information (“PII”) when you choose to provide such information, such as when you:

- Create an account;
- Post content related to your child’s healthcare and development;
- Add information to the Patient’s profile;
- Provide Patient assessment and screening information;
- Track or submit concerns regarding the Patient’s condition or care;
- Enter notes regarding the Patient;
- Create and maintain records of resources and assistance provided to a child through the HealthySteps Program;
- Identify next steps or to-do items; or
- Provide us feedback or contact us via email or through the “Contact Us” page on the App.

If you are a Provider, we also collect PII about you when you use the Services to schedule visits with the Patient and/or Family Member.

We also collect cookies and usage data (as described below), including your Internet Protocol (“IP”) address, browser type, and web log data (see the section of this Privacy Policy on Traffic Data, Analysis, and Cookies below for more details).

## **Your Protected Health Information and HIPAA Compliance**

If you are a Family Member sharing health-related information of a Patient through the Services, such information is likely to be protected health information (“PHI”) subject to the privacy and security safeguards of the Health Insurance Portability and Accountability Act and its regulations (“HIPAA”). ZTT’s use and disclosure of your PHI is governed by the HIPAA Notice of Privacy Practices of your Provider, but this Privacy Policy provides additional details regarding how ZTT protects the privacy and security of PHI and PII provided through the Services.

If you are a User and do not submit any health-related information that would otherwise be subject to HIPAA, then the terms of this Privacy Policy will govern ZTT’s use and disclosure of your PII.

## **Use and Disclosure of Personal Information**

Except as described in this Privacy Policy, ZTT will use your PII only to operate, enhance, improve, maintain, and update the Services and address your requests for information or new features, products, or services. We also will use your PII to verify accounts, monitor metrics of the Mobile App (such as total Users and User demographics), provide personalized content and information to you, diagnose or fix technology problems, invite you to participate in surveys and give feedback about the Mobile App. ZTT will not sell, rent, license, or trade your PII with third parties for their own direct marketing use unless we receive your express consent to do so. If you choose to give us PII, we may use that PII to correspond with you, provide you with requested materials, and contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. Unless you give us permission to do so, ZTT will not share your PII other than as specified in this Privacy Policy.

Disclosures to Third Parties Assisting In Our Operations. ZTT may share your PII under confidentiality agreements with other companies that work with, or on behalf of, ZTT to provide products and services. These companies may use your PII to assist ZTT in its operations. However, these companies do not have any independent right to share this information.

Disclosures Under Special Circumstances. We may provide information about you to respond to subpoenas, court orders, legal process or governmental regulations, or to establish or exercise our legal rights or defend against legal claims. We believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.

Business Transfers. We may share your PII with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of ZTT’s business to such business entity. We will require any such successor business entity to honor the terms of this Privacy Policy.

## **Security**

ZTT understands that storing our data in a secure manner is essential. ZTT stores PII using industry standard physical, technical and administrative safeguards to secure data against foreseeable risks, such as unauthorized use, access, disclosure, destruction or modification. Please note, however, that while ZTT has endeavored to create a secure and reliable Website and Mobile App, the confidentiality of any communication or material transmitted to/from the Services or via e-mail cannot be guaranteed. PHI provided through the Mobile App is safeguarded in a manner consistent with HIPAA security standards.

## **Traffic Data, Analysis, and Cookies**

Each time a User utilizes the Services, ZTT collects some information to improve the overall quality of the User's online experience.

Aggregated Data. ZTT collects aggregate queries for internal reporting and also counts, tracks, and aggregates the User's activity into ZTT's analysis of general traffic-flow of the Services. To these ends, ZTT may merge information about you into aggregated group data. In some cases, ZTT may remove personal identifiers from PII and maintain it in aggregate form that may later be combined with other information to generate anonymous, aggregated statistical information. Such anonymous, group data may be shared on an aggregated basis with ZTT's affiliates, business partners, service providers and/or vendors; if it does so, ZTT will not disclose your individual identity.

Web Server Logs and IP Addresses. An Internet Protocol ("IP") address is a number that automatically identifies the computer or device you have used to access the Internet. The IP address may disclose the server owned by your Internet Service Provider. ZTT may use IP addresses to conduct analyses and performance reviews and to administer the Website and Mobile App.

Cookies and Web Beacons. Cookies are pieces of information that a website transfers to a User's computer for purposes of storing information about a User's preferences. Cookies in and of themselves do not personally identify Users, although they do identify a User's computer. Many websites use cookies as a standard practice to provide useful features when a User visits the website and most web browsers are set up to accept cookies. You can set your browser to refuse cookies, but some portions of the Website may not work properly if you refuse cookies. We also use cookies to retrieve certain information previously provided by you to ZTT, so that you do not need to re-enter this information every time you visit the Website.

Some of the Website's web pages may use web beacons in conjunction with cookies to compile aggregate statistics about Website usage. A web beacon is an electronic image (also referred to as an "action tag," "single-pixel," or "clear GIF") that is commonly used to track the traffic patterns of Users from one web page to another in order to maximize web traffic flow and to otherwise analyze the effectiveness of the Website. Some web beacons may be unusable if you elect to reject their associated cookies.

## **Referrals/Links**

The Services may contain links to third party websites that may offer information of interest. This Privacy Policy does not apply to those websites, and ZTT recommends reviewing those websites' privacy policies individually.

## **Children's Privacy Protection**

ZTT understands the importance of protecting children's privacy in the interactive online world. The Services are not designed for, or intentionally targeted for use by, children under 13 years of age, although they are offered to Family Members of Patients under age 13. We aim to collect information only from parents or other authorized Family Members, and in compliance with the applicable requirements of the federal Children's Online Privacy Protection Act and HIPAA. No one under the age of 13 should directly submit any PII to ZTT through the Services; such information should be disclosed to ZTT by a Family Member in accordance with applicable law.

## **Updates to Privacy Policy**

If we decide to change our Privacy Policy, we will post those changes on our homepage and, with respect to the Mobile App, in the relevant app stores, so our Users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any point we decide to

use personally identifiable information in a manner different from that stated at the time it was collected, we will notify Users by way of an email or through the Mobile App. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the Privacy Policy under which the information was collected.

### **Passwords; Your Role in Protecting Your Personal Information.**

The Services allow access only to Users with valid passwords. You must take all necessary steps to ensure that no unauthorized person has access to your password or account. It is your sole responsibility to: (A) control the dissemination and use of activation codes and passwords; (B) authorize, monitor, and control access to and use of your account and password; and (C) promptly inform us of any need to deactivate a password or account.

### **Changes to Your Personal Information; Opt-Out**

You may review and request changes to your PII that ZTT has collected, including the removal of your PII from ZTT's databases in order to prevent receipt of future communications using any of the following options:

You can send your request via e-mail to [wellysupport@zerotothree.org](mailto:wellysupport@zerotothree.org).

You can mail your request to the following postal address:

ZERO TO THREE  
1255 23rd Street N.W. #350  
Washington, D.C. 20036  
Attn: HealthySteps Welly Support

### **Questions? Comments?**

We welcome your feedback. If you have questions or comments about our privacy policies, feel free to send us an e-mail at [wellysupport@zerotothree.org](mailto:wellysupport@zerotothree.org) or call us at (202) 638-1144.