

PRIVACY AND DATA RETENTION POLICY - Twink Jan, LLC

● What data do I keep and why do I need it?

Name and Age Basic identification to distinguish you from other clients

Address, Email Address, Phone Number I may use any one of these methods to contact you, send materials, arrange appointments, text, send or receive personalized information for your individual guidance and support.

Next of Kin/Medical Professional Details If I detect that you, or someone you tell me about, are in harm's way, being harmed, or at risk of being harmed, I am obliged to notify the appropriate authorities.

Personal Information Handwritten notes, digital notes, and personal data are kept to inform, support and maintain a record of your progress and client status.

● Will I share your data, with whom, and for what purpose?

Subpoena I may be required to share your information if subpoenaed by court.

Risk of Harm If I detect that you, or someone you tell me about, are in harm's way, being harmed, or at risk of being harmed, I am obliged to notify the appropriate authorities. I will inform you about these notifications as necessary for your safety or the safety of others.

Professional Inquiry I may discuss your case with colleagues in my field, using only your first initial or an alias, to increase the rate of your progress.

● How will my data be stored?

Data Storage Handwritten notes are kept in a locked filing cabinet; online notes are stored on a password protected computer; client identifiers, contact information, and notes are kept on a secure online client management system. Your phone number(s) may be stored temporarily on my business mobile phone with your first name and last initial.

● How long will I store your data and how will I dispose of it?

Retention and Disposition of Data All personally identifiable data is securely retained for the time required by my insurer (7 years). After this time, all personally identifiable hardcopy and digital data is destroyed and deleted from all hardcopy and online storage, devices and client management systems.