

# Privacy Policy

**Effective Date:** May 10, 2025

**Last Updated:** May 10, 2025

## Introduction

NeuraClinix ("we," "our," or "us") is committed to protecting your privacy and maintaining the confidentiality of your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our coming soon page and participate in our beta program.

Given our focus on mental health technology, we adhere to the highest standards of data protection, including HIPAA compliance for healthcare data and industry best practices for personal information security.

## Information We Collect

### 1. Information You Provide Directly

#### Beta Program Registration:

- Professional email address
- Professional role/title
- Organization name (optional)
- Any additional information you voluntarily provide in communications

#### Communications:

- Messages sent through contact forms
- Email correspondence
- Feedback and survey responses

### 2. Information Collected Automatically

#### Website Analytics:

- IP address (anonymized)
- Browser type and version
- Operating system
- Pages visited and time spent
- Referring website
- Device information (mobile/desktop)

- General geographic location (country/state level)

## **Technical Information:**

- Cookies and similar tracking technologies
- Log files and server data
- Performance metrics

## **3. Information We Do NOT Collect**

- **Health Information:** We do not collect any protected health information (PHI) through our coming soon page
- **Financial Information:** No payment or financial data is collected
- **Sensitive Personal Data:** No social security numbers, driver's license numbers, or other sensitive identifiers

## **How We Use Your Information**

### **Primary Purposes**

#### **1. Beta Program Management**

- Processing and managing beta program applications
- Communicating updates about NeuraClinix development
- Providing early access to qualified mental health professionals

#### **2. Service Improvement**

- Analyzing website performance and user experience
- Understanding user needs and preferences
- Improving our platform and services

#### **3. Communication**

- Sending important updates about our platform
- Responding to inquiries and support requests
- Providing information about mental health technology

## **Legal Bases for Processing (GDPR)**

- **Consent:** When you voluntarily provide information for the beta program
- **Legitimate Interest:** For analytics, security, and service improvement
- **Legal Obligation:** To comply with applicable laws and regulations

## **Information Sharing and Disclosure**

## We DO NOT Sell Your Information

NeuraClinix does not sell, rent, or trade personal information to third parties for marketing purposes.

## Limited Sharing Situations

### Service Providers:

- Secure cloud hosting services (with appropriate data processing agreements)
- Email marketing platforms (for beta program communications only)
- Analytics services (with anonymized data when possible)

### Legal Requirements:

- When required by law, regulation, or court order
- To protect the rights, safety, or property of NeuraClinix or others
- In connection with legal proceedings

### Business Transfers:

- In the event of a merger, acquisition, or sale of assets (with notice to affected users)

## Mental Health Professional Network

With explicit consent, we may connect beta participants with other qualified mental health professionals for collaborative feedback and platform development.

## Data Security

### Technical Safeguards

- **Encryption:** All data transmitted using TLS 1.3 encryption
- **Secure Storage:** Data stored on SOC 2 compliant cloud infrastructure
- **Access Controls:** Role-based access with multi-factor authentication
- **Regular Audits:** Quarterly security assessments and penetration testing

### Administrative Safeguards

- **Staff Training:** Regular privacy and security training for all personnel
- **Background Checks:** Comprehensive screening for employees with data access
- **Incident Response:** Established procedures for potential security breaches
- **Vendor Management:** Strict vetting and monitoring of third-party providers

### Physical Safeguards

- **Secure Facilities:** Restricted access to servers and data centers

- **Device Security:** Encrypted laptops and secure workstations
- **Disposal Procedures:** Secure destruction of hardware containing data

## Your Privacy Rights

### All Users

- **Access:** Request information about data we hold about you
- **Correction:** Request correction of inaccurate personal information
- **Deletion:** Request deletion of your personal information
- **Objection:** Object to certain types of data processing
- **Portability:** Request your data in a portable format

### GDPR Rights (EU Residents)

- **Right to be Forgotten:** Complete erasure of personal data
- **Data Portability:** Receive data in machine-readable format
- **Automated Decision-Making:** Not subject to automated decision-making
- **Supervisory Authority:** Right to file complaints with data protection authorities

### CCPA Rights (California Residents)

- **Know:** Right to know what personal information is collected
- **Delete:** Right to delete personal information
- **Opt-Out:** Right to opt-out of sale (we don't sell data)
- **Non-Discrimination:** Right to non-discriminatory treatment

### How to Exercise Your Rights

Email us at: [privacy@neuraclinix.com](mailto:privacy@neuraclinix.com)

Include in your request:

- Full name and email address
- Specific right you wish to exercise
- Verification of identity (for security purposes)

We will respond within 30 days of receiving a valid request.

## Cookies and Tracking Technologies

### Types of Cookies We Use

#### Strictly Necessary:

- Session management
- Security features
- Basic website functionality

### **Analytics (with consent):**

- Google Analytics (anonymized IP)
- Performance monitoring
- User experience optimization

### **Marketing (with consent):**

- Email marketing attribution
- Conversion tracking
- Beta program optimization

## **Managing Cookie Preferences**

You can control cookies through:

- Browser settings (block/delete cookies)
- Our cookie consent banner
- Privacy settings on third-party services

Note: Disabling cookies may limit website functionality.

## **International Data Transfers**

### **Cross-Border Processing**

Data may be processed in:

- United States (primary data centers)
- European Union (EU users)
- Other countries where our service providers operate

### **Transfer Safeguards**

- **Standard Contractual Clauses (SCCs)** for EU data
- **Adequacy Decisions** where applicable
- **Data Processing Agreements** with all vendors
- **Privacy Shield successor frameworks** as available

### **Data Retention**

## Retention Periods

### Beta Program Data:

- Active participants: Until platform launch + 2 years
- Withdrawn participants: 30 days after withdrawal
- Communication records: 3 years for business purposes

### Website Analytics:

- Aggregated data: Indefinitely (anonymized)
- Individual session data: 26 months
- Server logs: 90 days

**Legal Requirements:** Some data may be retained longer to comply with legal obligations or resolve disputes.

## Secure Deletion

When data is deleted:

- Immediate removal from active systems
- Secure overwriting of storage media
- Verification of complete deletion
- Certificate of destruction when applicable

## Children's Privacy

NeuraClinix services are intended for mental health professionals and are not directed to individuals under 18. We do not knowingly collect personal information from children under 18. If we learn that we have collected such information, we will delete it immediately.

## Mental Health Specific Considerations

### Crisis Situations

If beta program communications suggest imminent risk of harm, we may:

- Contact emergency services
- Notify appropriate authorities
- Breach confidentiality to protect safety

This overrides normal privacy protections in accordance with professional ethical guidelines.

## Professional Obligations

Beta participants remain subject to their professional licensing board requirements and ethical obligations regarding patient confidentiality and data protection.

## **Changes to This Privacy Policy**

### **Notification of Changes**

We will notify you of material changes by:

- Email to beta program participants
- Prominent notice on our website
- Updated "Last Modified" date

### **Consent to Changes**

Continued use of our services after changes constitutes acceptance of the updated policy. For material changes affecting data use, we may require explicit consent.

## **International Privacy Laws Compliance**

### **GDPR (European Union)**

- Lawful basis for all processing activities
- Data Protection Officer contact: [dpo@neuraclinix.com](mailto:dpo@neuraclinix.com)
- EU Representative: [To be appointed when serving EU users]

### **CCPA (California)**

- Transparent disclosure of data practices
- Consumer rights detailed above
- No sale of personal information

### **PIPEDA (Canada)**

- Meaningful consent for data collection
- Limited use and disclosure
- Individual access rights

## **Other Jurisdictions**

We monitor and comply with applicable privacy laws in all jurisdictions where we operate.

## **Contact Information**

### **Privacy Inquiries**

**Email:** [privacy@neuraclinix.com](mailto:privacy@neuraclinix.com)

**Phone:** +1-XXX-XXX-XXXX

**Mail:** NeuraClinix Privacy Office

[Your Address]

[City, State ZIP]

## **Data Protection Officer**

**Email:** [dpo@neuraclinix.com](mailto:dpo@neuraclinix.com)

## **Business Inquiries**

**Email:** [hello@neuraclinix.com](mailto:hello@neuraclinix.com)

## **Crisis Resources**

If you are experiencing a mental health crisis:

- **National Suicide Prevention Lifeline:** 988
- **Crisis Text Line:** Text HOME to 741741
- **International Association for Suicide Prevention:**  
[https://www.iasp.info/resources/Crisis\\_Centres/](https://www.iasp.info/resources/Crisis_Centres/)

## **Regulatory Information**

**HIPAA Compliance:** When handling protected health information, NeuraClinix will comply with all HIPAA requirements, including Business Associate Agreements with covered entities.

**FDA Considerations:** NeuraClinix is developing AI tools for mental health professionals. We will comply with applicable FDA regulations for medical device software.

**Professional Licensing:** We respect and support the professional licensing requirements of mental health practitioners using our platform.

---

**Last Updated:** May 10, 2025

This Privacy Policy is effective immediately and governs your use of NeuraClinix services. By using our services, you acknowledge that you have read and understood this Privacy Policy.

For questions about this Privacy Policy or our privacy practices, please contact us at [privacy@neuraclinix.com](mailto:privacy@neuraclinix.com).