CARRII NATIVE WEBSITE PRIVACY POLICY STATEMENT

Effective Date: March 1, 2026

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Introduction. The University of Virginia Center for Behavioral Health & Technology ("CBHT") is committed to respecting and protecting the privacy of each visitor of www.carriinative.org and related subdomains (the "Website") and users of CARRII Native websites, CARRII Native software, and internet and mobile application based services (which we collectively refer to as the "Services"). This Privacy Policy Statement (this "Privacy Policy") is issued by CBHT in conjunction with the CARRII Native Terms of Use and User Agreement ("Terms of Use") governing each User's use of the Services. This Privacy Policy explains under what circumstances CBHT (collectively, as "we," "us," or "our") gather information relating to each visitor or user of the Services (referred to in this Privacy Policy as "User", "you" or "your"), how we use such information, and who may access that information. This Privacy Policy is an integral part of the Terms of Use. All defined terms used in this Privacy Policy that are not otherwise defined shall have the meanings ascribed thereto in the Term of Use.

YOUR USE OF THE SERVICES CONSTITUTES YOUR UNCONDITIONAL ACCEPTANCE OF THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY AND THE OTHER TERMS AND CONDITIONS OF THE TERMS OF USE. IF YOU DO NOT AGREE WITH AND ACCEPT ALL OF THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY, DO NOT USE THE WEBSITE AND DO NOT PROVIDE OR SUBMIT ANY PERSONALLY IDENTIFIABLE INFORMATION VIA OR WHILE USING THE SERVICES.

This Privacy Policy may be revised by us periodically. We recommend reviewing this Privacy Policy each time you visit the Website or use the Services so that you are aware of any changes. Your use of the Website or the Services following any changes in this Privacy Policy will constitute your acceptance of such modifications. Should we make any material changes to this Privacy Policy, we will include a notice on the homepage of the Website stating that this Privacy Policy has been updated.

1. **Collection of Personal Information.**

As fully explained in Section 4 and Section 9 of the Terms of Use (Terms of Use can be found on the www.carriinative.org website), there are two primary methods through which we may collect personal information from you. The first method is in connection with the establishment of your User Account. The personally identifiable information that we collect in connection with the account registration process ("Registration Information") may vary, but typically includes, but is not limited to, your name, e-mail address, home address, telephone number, information necessary to process your account. As part of a CARRII Native study, a member of the study team may enter in this Registration Information into the System as well.

The second method is when you make non-identifying information available while using the Services ("User Information"). You may make User Information available when you voluntarily upload, submit, or transmit User Submissions through the Services. For example, a User may submit information concerning their progress within the CARRII Native program or submit information into the Services concerning their drinking, vaginal intercourse, contraception use, etc. User Information does not, on its own, permit direct association with any specific individual. User Information is associated with your particular numerical user ID assigned to you by us and that numerical user ID is associated with your email address.

While User Information is an important element for the most effective utilization of the Website and the Services, you are under no obligation to provide any User Information. If you do provide User Information, you are thereby consenting to the use and disclosure of such User Information in accordance with the terms and conditions of the Terms of Use and this Privacy Policy.

2. **Our Use and Sharing of Your Personal Information.**

Your Registration Information or User Information (collectively, "Personal Information") is stored on our servers and computer networks or those of our business partners, suppliers or hosting services providers. CBHT will only use your Personal Information as is reasonably necessary for: (a) the operation and maintenance of the Services, including providing support and maintenance services to you; (b) contacting you with information relating to the Services or your Subscription; and (c) conducting research and measurement activities. We are committed to protecting your privacy and we will not sell or lease your Personal Information to any third party for marketing or any purpose. We will not require you to disclose more information than is reasonably necessary to effectively utilize the Services as a condition of participation as required for use of the foregoing.

Except as described in this Privacy Policy, including Section 3 below, we will not disclose your Personal Information without your consent. We may publish or otherwise share aggregated User Information including, without limitation, data from research and measurement activities and demographic and statistical information, with our partners and other third parties. This aggregated User Information is not linked to any Personal Information that can identify any individual person.

3. **Sharing Your Personal Information with Third Parties**

Although we will make all reasonable efforts to preserve your privacy, we may disclose your Personal Information:

(a) to an organization or study team that is providing your Subscription to you for purposes of conducting research and measurement activities. In this case, the use of your Personal Information by any such third party shall be subject to the terms of the privacy statement issued by that third party, and we are not responsible for such use;

(b) to our business partners and agents, such as financial institutions, suppliers, delivery services, parties providing hosting services, and web and technical support providers, as is necessary or required in connection with the operation, maintenance and support of the Services, in which case we will request that such third parties maintain the confidentiality of your Personal Information in accordance with the terms of this Privacy Policy;

(c) to comply with any legal requirements or court orders, to defend any legal or administrative proceedings, or as we believe in good faith is necessary to comply with any laws or legal requirements;

(d) to protect any individual's personal safety in an emergency situation; and

(e) to protect or defend our rights or property (including enforcement of our rights under the Terms of Use)

4. **E-mail Communications.**

From time to time, we may e-mail you news bulletins, information on technical service issues, or information relating to the Services, and/or your Subscription. You consent to the delivery of such communications by e-mail to the e-mail address(es) that you provide to CBHT when establishing your User Account.

5. **Clickstream Data and Cookies.**

In addition to the Personal Information that you supply to us, we may collect, store and use certain, anonymous information known as “Clickstream Data” as you access and navigate the Website and the Services. We use this information to gain a better understanding of how people use the Website and the Services, to analyze data for trends and statistics, to help diagnose problems with our servers and computer networks, and to enhance the performance of the Website, the Software and the Services. The Clickstream Data that we may collect, store and use may include the IP address of your computer (automatically assigned by your Internet Service Provider whenever you log onto the Internet), the Internet address of the site from which you linked to the Website or the Services (known as the referring URL), the date and time you access to the Website or the Services, what pages of the Website or the Services you visit and when, and the type of browser you use. Clickstream Data is not personally identifiable, and we do not link this information to personally identifiable data, or any of your Personal Information.

We also may use session cookies, which are small text files placed on your browser that maintain information from page to page as you navigate the Website or the Services. If you do not want session cookies stored on your computer, you might be able to adjust your browser settings to refuse all cookies, including sessions cookies, although this may prevent you from using certain features of the Website and the Services.

6. **Third Party Sites.**

The Website and the Services may contain links to other websites that are run by third parties. Once you have clicked on a link or button activator connecting you to such third-party website, you will leave the Website or the Services and be taken to a website that we do not control. This Privacy Policy does not apply to any third party sites. We are NOT RESPONSIBLE FOR THE CONTENT OF ANY LINKED SITES AND MAKE NO REPRESENTATIONS REGARDING THE CONTENT OR ACCURACY OF MATERIALS ON SUCH SITES. We suggest you read the privacy statement of any third-party website before providing any personally identifiable data on that site. We are not responsible for any use by any person or entity of any information that you may provide while accessing or using any third-party website.

7. **Children’s Privacy.**

The Website and the Services are designed and intended for use only by individuals who are at least eighteen (18) years old. To ensure compliance with the Children’s Online Privacy Protection Act (COPPA), we will not intentionally or knowingly collect any personal information from any individual who is not at least eighteen (18) years old.

8. **Security.**

We have implemented reasonable physical measures and administrative procedures to safeguard against unauthorized access and help prevent the loss, misuse or alteration of your Personal Information in accordance with the terms of this Privacy Policy. However, we cannot guarantee that the security measures we implement in connection with the operation of the Services will absolutely prevent others from accessing or acquiring any of your Personal Information.

9. **Contacting CBHT.**

You may send an e-mail to CBHT, and we will work to ensure your query is passed on to and answered by the appropriate person in a timely manner. Please be aware that e-mail you send us is not necessarily secure against interception. If your communication pertains to sensitive information, then you should contact us via regular mail or telephone. If you have any questions about this Privacy Policy or the practices of CBHT, you can contact us as follows:

By mail:	Privacy Officer, CBHT, 560 Ray C Hunt Drive Charlottesville, VA 22903
By e-mail:	uvabht@virginia.edu
By telephone:	855-467-4884