

PRIVACY POLICY

This Privacy Policy discloses the privacy practices for Thrive Telehealth, LLC (“Thrive”), <https://thrivehrt.com/> website, any available application and various related services (together referred to as the "Site"). Thrive Telehealth, LLC, the provider of the services (referred to as "us" or "we"), is committed to protecting your privacy online. Please read the information below to learn the following regarding your use of our Site and services. You acknowledge that this Privacy Policy is part of our Terms of Use, and by accessing or using our Site and services, you agree to be bound by all of its terms and conditions. If you do not agree to these terms, please do not access or use our Site or services. You shall be referred to as “you” or “user.”

Scope of this Web and Mobile Privacy Policy

This Privacy Policy describes the types of Personal Information we collect from visitors of our public Site and our practices for using, maintaining, sharing, and protecting it. It also describes the rights and choices you may have with respect to your Personal Information and how you may contact us.

This Privacy Policy **does not apply to** information collected from visitors who register and log-in ("Members") to any password-protected and secure portions of our Site, including login pages and registration pages ("Secure Platforms"). Additionally, we may use a third party site for the creation of your account and logging in to the Secure Platforms. All such use shall be subject to those third party site’s terms of service and privacy policies. The Secure Platforms allow eligible members to use the Site. All information collected and stored by Thrive or added by our members into such Secure Platforms is considered Protected Health Information ("PHI") and/or medical information and is governed by laws that apply to that information, for example the Health Insurance Portability and Accountability Act (HIPAA). How Thrive uses and discloses such PHI is in accordance with the Thrive Health Notice of Privacy Practices. To understand how we use and disclose PHI, you should review our Notice of Privacy Practices. The Notice of Privacy Practices (and not this Privacy Policy) also applies to Personal Information collected on our Websites if specific symptoms or health conditions is also collected, as such information may be considered PHI under HIPAA.

Residents of states with heightened privacy laws should read the information available in the Regional Privacy Statement below about the categories of Personal Information to be collected from them and the purposes for which the Personal Information will be used.

This Privacy Policy is not a contract and does not create any contractual rights or obligations.

I. Types of Collected Information

We, or our advertising partners, may receive, collect and store information about you automatically through the use of cookies (see below) and other tracking technologies. Information we collect may be from information you enter on our Site or provide us in any other way. In addition, we may collect the internet protocol (IP) address used to connect your computer or other electronic

device to the internet; login; e-mail address; password; computer and connection information, purchase history. If you retain us for our services, we will also be collecting PHI for the provision of those services. Use of PHI is governed by the Thrive Health Notice of Privacy Practices.

You acknowledge our minimum age requirements and certify you are at least eighteen (18) years of age. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page or the Site. We may also collect personally identifiable information (including name, email, password, communications); payment details (including credit card information), protected health information (including medical files containing diagnoses), comments, feedback, recommendations, and personal profile.

II. Methods of Collection

We may collect Personal Information using the following methods:

- Directly from you when you provide it to us (such as information you enter into web forms, inquiries, responses, activity on the Site, and during registration to use a Secure Platform).
- From third parties, such as analytics and email marketing service providers.
- Automatically through tracking technologies such as cookies, web beacons (also known as pixels) and log files, including over time and across our own and third-party websites or other online services.

"Cookies" are small files that a website stores on a user's computer or device. The Site may use cookies for various purposes, including to keep the information you enter on multiple pages together. Some of the cookies we may use are "session" cookies, meaning that they are automatically deleted from your hard drive after you close your browser at the end of your session. Session cookies may be used to optimize performance of the Site and to limit the amount of redundant data that is downloaded during a single session. We also may use "persistent" cookies, which remain on your computer or device unless deleted by you (or by your browser settings). We may use persistent cookies for various purposes, such as statistical analysis of performance to ensure the ongoing quality of our services. We and third parties may use session and persistent cookies for analytics and advertising purposes, as described herein. Most web browsers automatically accept cookies, but you may set your browser to block certain cookies (see below).

Our Site may use Google Analytics, a vendor's service that uses cookies, web beacons, web pixels and/or similar technology to collect and store information about you. You can learn more about Google Analytics' privacy policy and ways to opt out from Google Analytics tracking by visiting Google Analytics' website.

Our Site may use Adobe's analytics and on-site personalization services, which use cookies, web beacons, web pixels and/or similar technology to collect and store information about you or your device or browser. You can learn more about how Adobe may handle information collected through our use of its services, and your options for controlling this activity, by visiting Adobe's website.

III. Reason for Collection of Information

We collect such non-personal and Personal Information (defined below) for the following purposes:

1. To provide and operate the Site and services;
2. To provide you with ongoing customer assistance and technical support;
3. To be able to contact you with general or personalized service-related notices and promotional messages;
4. To create aggregated statistical data and other aggregated and/or inferred non-personal information, which we or our business partners may use to provide and improve our respective Site and services;
5. To comply with any applicable laws and regulations.

IV. How We Use Your Information

We may use your Personal Information for the following purposes:

- Operate, maintain, supervise, administer, and enhance the Site, including monitoring and analyzing the effectiveness of content on the Site, aggregate Site usage data, and other usage of the Site such as checking your eligibility and assisting you in completing the registration process.
- Provide you with a tailored and user-friendly experience as you navigate our Site.
- Promote and market our Site to you.
- To complete the activity you specifically asked for, e.g., register on a Secure Platform, obtain more information or request an appointment.
- Conduct research on users' demographics, interests, and behavior based upon information provided during use of our Site.
- Aggregate information for analytics and reporting.
- Respond to law enforcement requests and court orders and legal process and carry out our legal and contractual obligations and enforce our rights.
- Authenticate use, detect potential fraudulent use, and otherwise maintain the security of the Site and safety of users.
- Develop, test, improve, and demonstrate the Site.
- Any other purpose with your consent.

V. How We Share Your Information

We may share Personal Information with third parties including service providers in certain circumstances or for certain purposes, including:

- ***For business purposes.*** We may share your Personal Information with vendors and service providers, including our data hosting and data storage partners, analytics and advertising providers, technology services and support, and data security. We also may share Personal Information with professional advisors, such as auditors, law firms, and accounting firms. We may disclose your name, email address, date of birth, phone number, and address if you provided it to us via a form on the website or during an incomplete or failed registration to Service Providers.
- ***With your direction or consent.*** We may share your Personal Information with third parties if you request or direct us to do so. This includes your use of social media widgets on our Site.

- ***With affiliates within our corporate group.*** We may share your Personal Information with any subsidiaries or affiliates within our corporate group.
- ***Compliance with law.*** We may share your Personal Information to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries.
- ***In the context of a transaction.*** We may share your Personal Information in connection with an asset sale, merger, bankruptcy, or other business transaction.
- ***For other business reasons.*** We may share your Personal Information to enforce any applicable legal disclaimer or indemnification, and to ensure the safety and security of the Site and/or our users.
- ***For advertising.*** Using cookies and web beacons, we may disclose Personal Information regarding your activity on our Site to third-party advertising partners to optimize marketing.
- ***Influencer marketing.*** If you signed up with us through a link provided by one of our influencer marketers (“Influencer”), we may share your deidentified patient identification number, along with the amount of money you spend, with the Influencer for tracking or billing purposes only. We will not disclose any health or other information to the Influencer. By signing up with us via an Influencer link, you agree to allow such disclosure to the Influencer. In the event you withdrawal your consent, we may have to terminate our services with you, at our sole discretion, because of our agreement with the Influencer.

We also may disclose deidentified information. Note that if you make any Personal Information publicly available on the Site, anyone may see and use such information.

VI. How Long Do We Keep Your Information

We keep your information as long as we need it to provide our Site and services, comply with legal obligations or protect our or other’s interests. We decide how long we need information on a case-by-case basis.

VII. How Do We Safeguard Your Information

We rely on many mechanisms for data transfers, including but not limited to, contractual clauses and use of software with industry standard security. Your PHI will be stored using a HIPAA compliant software.

VIII. Third Party Website and Links

Our Site may contain links to other online platforms operated by third parties. We do not control such other online platforms and are not responsible for their content, their privacy policies, or their use of your information. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as Facebook, Instagram, LinkedIn or Twitter) may also be viewable by other users of the Site and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on the Site. WE EXPRESSLY DISCLAIM ANY AND

ALL LIABILITY FOR THE ACTIONS OF THIRD PARTIES, INCLUDING BUT WITHOUT LIMITATION, TO ACTIONS RELATING TO THE USE AND/OR DISCLOSURE OF PERSONAL INFORMATION BY THIRD PARTIES. ANY INFORMATION SUBMITTED BY YOU DIRECTLY TO THESE THIRD PARTIES IS SUBJECT TO THAT THIRD PARTY'S PRIVACY POLICY.

IX. Communication with Site Users

We may contact you for notifications regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, to send updates about us, or as otherwise necessary to contact you to enforce our Terms of Use or other policies, applicable laws, and any agreement we may have with you. For these purposes, we may contact your email, telephone, text messages, and postal mail address.

X. Cookies and Information Used for Advertising

A. Usage of Cookies and Similar Tracking Tools

As discussed above, on our Site we may collect and disclose Personal Information about your online activities for use in providing you with advertising about products and services tailored to your individual interests. This section of our Privacy Policy provides details and explains how to exercise your choices. You may see certain ads on other websites because we participate in advertising networks. Ad networks allow us to target our messaging to users through demographic, interest-based and contextual means. These networks track your online activities over time by collecting information through automated means, including through the use of cookies, web server logs, and web beacons (also known as pixels). The networks use this information to show you advertisements that may be tailored to your individual interests. The information our ad networks may collect includes information about your visits to websites that participate in the relevant advertising networks, such as the webpages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Site and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

You may disable or delete browser cookies through your browser settings. Cookies generally are easy to disable or delete, but the method varies between browsers. If you disable or delete cookies, or if you are running third-party software that intercepts or deletes cookies, please note that some parts or functionality of our Site may not work properly.

To ascertain how to disable cookies on your web browser, go to your web browser and search for how to disable cookies for that specific browser.

If you have additional questions about the specific information about you that we process or retain, as well as your choices regarding our collection and use practices, please contact us using the information listed below.

B. Why We Use Cookies

We may use cookies for the following reasons:

- Authentication – Cookies help us verify your account and determine when you are logged in so that it makes it easier to access our Site and services.
- Security – We may use cookies to help us keep your account, data and Site and services safe and secure. We may also use cookies to combat activity that violates our policies or otherwise degrades our ability to provide the Site and services.
- Advertising – We may use cookies to help us show ads and to make recommendations of other businesses or organizations for which you may be interested in their products, services or causes they promote. We also use cookies to track and measure the efficacy of ad campaigns.
- Features – We may use cookies to enable the functionality for the provision of the Site and services.
- Experience – We may use cookies to provide you with the best experience possible.
- Analytics and Research – We may use cookies to help us understand how you are using the Site and services so we can improve them.

C. Withdrawal of Consent

If you no longer wish for us to process your data, please contact us at support@thrivehrt.com.

D. Privacy Policy Updates

We reserve the right to modify this Privacy Policy at any time for any reason. It is your sole responsibility to check our policies so please review them frequently. Changes and clarifications will take effect immediately upon their posting on the Site. Should we make material changes to this policy, we will notify you here that it has been updated so that you are aware of what information we collect and how it is used.

UNITED STATES REGIONAL PRIVACY STATEMENT

This Privacy Statement is for residents that reside in the States of California, Utah, Virginia, Texas, Connecticut, and Colorado (“consumers” or “you”). We adopt this Statement to comply with the various laws applicable to those states.

I. Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal Information”). In particular, we have collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category	Examples	Collected
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A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name or other similar identifiers.	YES
B. Personal Information categories	A name, signature, physical characteristics or description, address, telephone number, driver's license or state identification card number, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under State or federal law.	Age (40 years or older), race, color, ancestry, national origin, religion or creed, marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO

F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal Information does not include the following:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the applicable law's scope, like:
 - o Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), a state equivalent or clinical trial data;
 - o Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or applicable state law, and the Driver's Privacy Protection Act of 1994.

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you or our service providers.
- Third party partners such as analytics and marketing partners.
- Directly and indirectly from activity within our Site, such as tracking technologies.

II. Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To provide you with information, products or Site and services that you request from us, or otherwise communicate with you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our Site and present its contents to you.
- To promote safety, security and integrity.
- For analytics, testing, research, analysis and product or Service development.
- As necessary or appropriate to protect the rights, property or safety of us, you, our Service Providers or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the applicable law.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

III. Sharing Personal Information

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

- Category A: Identifiers.
- Category B: Customer Records personal information categories.
- Category D: Commercial information

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Contractual service providers.
- Affiliated advertising networks, internet service providers and data analytics providers
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.

You may have the following rights regarding your Personal Information maintained by Thrive:

- Request to know and access the Personal Information we collect, use, and disclose;
- Request deletion of Personal Information;
- Request to opt-out of the sale or sharing of Personal Information;
- Right to limit use and disclosure of sensitive Personal Information and
- Not receive discriminatory treatment by Thrive for exercising these rights.

The rights described below are limited to those provided under the applicable law to the applicable residents of those states. The specific rights may vary based on whether the applicable law applies

IV. Requests to Know and Access

You may have the right to request that we disclose to you the following information:

- Categories of Personal Information that Thrive has collected about you, disclosed about you for a business purpose, or sold or shared;
- Categories of sources from which the Personal Information is collected;
- Categories of third parties with whom Thrive shares or to whom Thrive sells Personal Information;
- The business or commercial purpose for collecting and selling Personal Information; and
- Specific pieces of Personal Information that Teladoc has collected about you.

Instructions for submitting a verifiable request are provided below.

You may only make a request for access twice within a 12-month period.

V. Requests to Delete

You may have the right to request that we delete Personal Information associated with you, subject to applicable law and certain exceptions.

Instructions for submitting a verifiable request are provided below.

VI. Request to Correct Inaccurate Personal Information

You may have the right to request that Teladoc corrects Personal Information that is inaccurate.

Instructions for submitting a verifiable request are provided below.

VII. Requests to Opt-Out of the Sale or Sharing of your Personal Information

You may have the right to submit a request to opt out of any sale or sharing of your Personal Information or the processing of your Personal Information for purposes of targeted advertising. However, Thrive does not sell your Personal Information and does not use or share Personal Information collected from users of our public websites to engage in targeted advertising unless you have opted-in to such use. And, in the last 12 month, Thrive has not sold or shared Personal Information (as those terms are defined under the applicable law).

Instructions for submitting a verifiable request are provided below.

VIII. How to Exercise Your Rights

To submit a request to exercise any of your rights, please email us at support@thrivehrt.com.

As required under applicable law, we must take steps to verify your request before we can provide Personal Information to you, delete Personal Information, or otherwise process your request. To verify your request, we may require you to provide your name, physical address, email address, contact information, and information about your account or previous transactions with us. If you have only visited our public Site and did not provide any Personal Information to us via a web form or through the registration process, we will need you to provide us with your IP address or device ID in order for us to determine if we have that information. We will not be able to determine if we have your IP address or device ID from your name, physical address, email address, contact information, or account information.

We will further verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as your date of birth or government identifier, in order to protect against fraudulent requests.

We will deliver Personal Information that we are required by law to disclose to you in the manner required by law within forty-five (45) days after receipt of a verifiable request, unless we notify you that we require additional time to respond, in which case we will respond within such additional period of time required by law. We may deliver the Personal Information to you electronically or by mail at your option. If electronically, then we will deliver the information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information from one entity to another without hindrance.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may designate an authorized agent to request any of the above rights on your behalf. You may make such a designation by providing the agent with written permission, signed and notarized by you, to act on your behalf. Your agent may contact us by the information provided in the "How to Contact Us" section below to make a request on your behalf. Even if you choose to use an agent, we may, as permitted by law, require verification of the agent's authorization to act on your behalf, require you to confirm you have authorized the agent to act on your behalf, or require you to verify your own identity.

IX. Right to Nondiscrimination

You have the right to be free from discriminatory treatment for exercising the privacy rights conferred by applicable law, including not being: denied goods or services; charged different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; provided a different level or quality of goods or services; or suggested that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

X. Updating This Privacy Statement

This Privacy Statement may be updated periodically to reflect changes in our privacy practices. It is your responsibility to review the Privacy Policy from time to time to view any such changes.

XI. How to Contact Us

If you have any questions about our privacy practices or this Privacy Policy or Privacy Statement, please email us at support@thrivehrt.com.

THRIVE TELEHEALTH NOTICE OF PRIVACY PRACTICE

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

I. Effective Date

This Notice of Privacy Practices ("Notice") took effect on August 1, 2024. It will remain in effect until Thrive Telehealth, LLC ("Thrive," "we," "us," "our") replaces it. Thrive shall abide by the terms of this Notice while it is in effect.

II. Thrive's Commitment To Your Privacy

Thrive is a clinically integrated care setting in which our members receive health care services ("Services") from more than one health care provider.

Thrive respects and is committed to protecting the privacy of your medical information. In performing its Services, Thrive will receive, create, and disclose your protected health information ("PHI"). Thrive is required by law to maintain the privacy and security of your PHI and to provide you with notice of our legal duties and privacy practices with respect to your PHI. For information about our collection, use, and disclosure of personal information other than PHI, please see our Privacy Policy and related privacy notices posted on our Site.

III. Your Information and Rights; Our Responsibilities

In this Notice, we describe:

- Information We Collect About You
 - When We Use and Share Your Information
 - When We Must Share Your Information
 - When We Need Your Authorization to Use or Share Your Information
 - Your Rights Regarding Your Information
 - How We Keep Your Information Safe
 - Changes to the Terms of This Notice

A. Information We Collect About You

To provide you with the Services, we collect PHI about you from a few sources including directly from you. PHI is information about you that may be used to identify you (such as your name), and that relates to:

- Your past, present or future physical or mental health or condition,
 - The provision of healthcare to you, or
 - Your past, present, or future payment for the provision of healthcare.

1. PHI Collected From You

As you use our Services, you will need to provide us with information about yourself and your medical history, past treatment, and potential future treatment options. As you communicate with us your telephone calls, emails, and other communications between you and us may be recorded and logged. As such we will collect and maintain all information discussed during such communications including your identity, the date and time of the communication, and the content of the communication

2. PHI Collected from Third Parties

Connected with our Services, we may collect information about you from third parties such as: (a) past or current health care providers; (b) your pharmacy; (c) your medical file that you provide; or (d) other organization that may contract with us to give you access to the Services, which may provide us with your name and demographic information so we know you are eligible for the Services.

3. PHI Collected Automatically

When you register or log in to our Site from the third party software we use for account creation and management, we may automatically collect information about you. We must be able to link your activity back to your identity so that changes in our systems can be made and we can track the Services you used. as such, we automatically collect the following types of information when you use our Site: (a) IP address; (b) device information; (c) general geographic information; (d) date and times you accessed and used our Site and any features therein.

B. When We Use and Share Your Information

To provide you with the Services, we will need to use and disclose your PHI for the following reasons:

1. Treatment Activities

We will use your PHI within Thrive to treat you and provide you with services. We may also disclose your PHI to other physicians or health care providers so that they can treat you and provide you with services, and we may be required to disclose your PHI to third party labs and pharmacies so they can ship you any prescription you may be prescribed. For example, electronic prescriptions written by Thrive may be available to other treating physicians to ensure your quality of care. It may also be available to your primary care physician. When you use our Services, to enhance the continuity and quality of care we provide to you, your PHI may be available to providers within Thrive for them to provide you with treatment and medical services. For example, your past consultations will be available to the provider when you seek a new consultation.

2. Payment Activities

We can use and share your PHI to get paid and for other payment activities. For example, we will send a claim to collections if you have not paid for any services rendered. We may share PHI with other entities covered by HIPAA, such as health plans, for their payment activities.

3. Healthcare Operations Purposes

Thrive may use and disclose your PHI to run our business. For example, we may contact you about the Services available to you, monitor the qualifications of providers, to improve medical services, to provide customer service, to conduct quality reviews, or use your PHI for other healthcare operational activities. We may share PHI with other entities covered by HIPAA, such as health plans, or our service providers with whom we have an appropriate agreement.

4. We may also use PHI to:

- a. Participate in health information exchanges so that we can share, request, and receive electronic health information from other healthcare organizations for treatment, payment, and healthcare operations purposes as described above.
- b. Engage third parties to assist us with our payment and healthcare operations. If any such third party needs to access PHI to perform its services on our behalf, we will require that third party to enter into a written agreement that protects the PHI. We provide only the minimal amount of PHI needed to accomplish their intended objective.
- c. Communicate with family and friends who are involved in your care and payment for care and with whom we have received a valid, written release.
- d. Create the identified and aggregate information.

C. When We Must Share Your Information

There are limited times when we may be permitted or required by law to use or disclose your PHI without your authorization. These may include:

1. For public health activities such as reporting certain diseases
2. To protect victims of abuse or neglect, such as child abuse or elder abuse
3. For workers compensation claims
4. For judicial and administrative proceedings such as responding to subpoenas
5. When required by law for law enforcement purposes
6. For specialized government functions such as national security
7. To prevent or lessen a serious and imminent threat of harm to a person or the public
8. For research approved by an Institutional Review Board
9. To coroners, medical examiners, and funeral directors in limited circumstances
10. For organ donation and transplantation

D. When We Need Your Authorization to Use or Share Your Information

We will not share your PHI for other purposes not described in this Notice.

If we want to use or disclose your PHI for the purposes listed above or for any other purpose not described in this Notice, we will seek your authorization using a HIPAA authorization form. You have the right to revoke any authorization that you previously provided.

E. Your Rights Regarding Your PHI

You have the following rights regarding your PHI maintained by us. Additionally, your medical power of attorney or legal guardian can exercise these rights on your behalf and make choices about your health information.

1. Right to Access PHI
Most of your PHI that we maintain will be available to you through your portal. To request access to information that is not available to you online, please submit a request to us in writing. We may impose a fee for the costs related to copying and mailing.
2. Right to Request Amendment of PHI
You have the right to request that we amend your PHI if you believe that it is incorrect. You may also be able to amend your PHI by logging into your account. For us to make the amendment, please contact us at the information below.
3. Right to Request Restrictions On Uses and Disclosures of PHI
You have the right to request that we do not use or disclose your PHI for treatment, payment, or health care operation purposes. To make such a request please contact us at the information provided below. We are not required to agree to your request unless you are requesting that we do not disclose your PHI to a third party that has agreed to pay for your services. In such cases, you will be required to pay for services out of pocket.
4. Right to Request Confidential Communication
You may request that we communicate with you through alternate means or an alternate location. To request confidential communications, you must submit your request to us in writing at the information provided below. We are not required to agree to your request; however, we will use our best efforts to agree to reasonable requests.
5. Right to Request an Accounting of Disclosures
You have the right to receive an accounting of disclosures we have made of your PHI. To request an accounting of such disclosures, you must submit the request in writing at the information below. Your right to an accounting of disclosures does not include disclosures made for treatment, payment or healthcare operations, disclosures made pursuant to an authorization, and certain other disclosures.

You also have the right to (1) obtain a digital copy of this notice from us upon request; (2) File a complaint with your Secretary of State if you believe that your privacy rights have been violated; and (3) obtain more information about our privacy practices by contacting us below:

By email
support@thrivehrt.com

F. How We Keep Your PHI Safe

The security of your PHI is very important to us none of the PHI you provide to us as protected by strict security safeguards. We use administrative, technical, and physical safeguards to keep your PHI from unauthorized access, and other threats and hazards to its security and integrity. We base our security program on complying with state and federal law, including the HIPAA security regulation guidelines as well as industry best practices.

If your PHI is disclosed to an unauthorized person, despite our security safeguards, we will notify you promptly if such disclosure may have compromised the privacy or security of the PHI.

G. Changes To This Notice

We reserve the right to change the terms of this Notice at any time, as long as the changes are in compliance with applicable law. If we change the terms of this Notice, the new terms will apply to all PHI we maintain. If we change this Notice, we will post the new Notice on our Site and it will be available at the bottom of the Site.