

# **Privacy Policy**

Your privacy is important to us. This privacy policy ("Privacy Policy") covers our online privacy practices with respect to use and/or disclosure of information we may collect from you when you access or use this website ("Website"), portals, and any other websites or applications we may provide that link to this Privacy Policy (collectively, our "Online Services"). The Online Services are provided by Quality First Home Care, Inc. (hereinafter "we," "us," or "our"). This Privacy Policy does not apply to information collected through other means, such as by telephone or in person.

## **Web Server Logs**

When you access or use our Online Services, we may track information to administer our Online Services and analyze its usage. Examples of information we may track include:

- Your Internet protocol address
- The kind of browser or computer you use
- Number of links you click within our Online Services
- State or country from which you accessed our Online Services
- Date and time of your visit
- Name of your Internet service provider
- Third party websites you linked to from our Online Services
- Pages or information you viewed on our Online Services

We use this information to analyze trends, administer and improve our Online Services, and monitor traffic and usage patterns for information security purposes and to help make our Online Services more useful.

## **Cookies and Web Beacons**

A "cookie" is a small text file that may be transferred to your computer's hard drive in order to personalize our Online Services for you and to collect aggregate information regarding usage of our Online Services by all of our users. Each computer is assigned a different cookie that contains a random, unique number. Our Online Services may use two (2) different types of cookies: a "session" cookie, which is required to track a user session, and a "persistent" cookie, used to track unique visits to the Portal (defined below), as well as how the user arrived at the Portal (for example, through an email link or from a referral link), and the type of user (patient, provider, etc.). So that users are not counted twice, this cookie can "persist" anywhere from six months to two years.

Your browser software can be set to warn you of cookies or reject all cookies. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section of the toolbar. If you reject our cookie, this may disable some of the functionality of our Online Services and you may not be able to use certain Online Services.

Cookies cannot be used to run programs or deliver viruses to your computer. One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page, or navigate within a website, a cookie helps the website to recall your specific information on subsequent visits. This simplifies the process of delivering relevant content and eases website navigation by providing and saving your preferences and login information as well as providing personalized functionality.

We may use Google Analytics on our Site to help us analyze the traffic on our Site. Some of features on our Online Services may use cookies or other methods to gather information regarding your use of the Online Services, and may combine the information in these cookies with any of Personal Information about you that they may have. The use of such information by a third party depends on the privacy policy of that third party.

A "web beacon," "clear GIF," "web bug," or "pixel tag" is a tiny graphic file with a unique identifier that is similar in function to a cookie, but would allow us to count the number of users that have visited certain pages or screens of our websites, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, web beacons can tell the sender whether and when the email has been opened. In contrast to cookies, which may be stored on your computer's hard drive, web beacons are typically embedded invisibly on pages or screens.

We reserve the right to share aggregated site statistics monitored by cookies and web beacons with our affiliates and partner companies. We treat the information of everyone who comes to our Online Services in accordance with this Privacy Policy, whatever their Do Not Track setting.

### **Geolocation Data**

We do not collect precise information (e.g., GPS data; latitude and longitude) concerning the location from which you access the Online Services, but we collect information on your region or postal code to help us gather information useful for improving the relevance of our content and securing our Online Services.

### **Third Party Advertising**

We may allow third party advertising companies to serve ads when you access or use our Online Services. These companies use non-personally identifiable information regarding your access and use of our Online Services and other websites, such as the user IP address, pages viewed, date and time of your visit, and number of times you have viewed an ad (but not your name, address, or other personal information), to serve ads to you on our Online Services and other websites that may be of interest to you. In the course of serving advertisements to our Online Services, our third party advertiser may place or recognize a unique cookie on your browser. In addition, we may use clear GIFs or pixel tags to help manage our online advertising. These clear GIFs enable our ad serving company to recognize a browser's cookie when a browser visits our Online Services. This allows us to learn which banner ads bring users to our Online Services.

### **Information Collected through the Portal**

As a service to its customers, we may also provide Portals to offer some patients secure, private access to their own records, as well as certain internet-based Online Services which may include, among other things and access to health and patient education materials and secure messaging ("Portal").

The Portal can provide you with access to some of your medical records. When you seek access to those records on the Portal, we need to confirm your identity through the use of your name and email or physical address and other information such as your date of birth and answers to "secret questions" to which only you know the answers. This information may be used to help administer and manage your Portal account.

### **The Purposes for Which We Use Personal Information**

If you submit or we collect Personal Information through our Online Services, then such Personal Information may be used in the following ways: (i) to provide, analyze, administer, and improve our Online Services; (ii) to contact you in connection with our Online Services and appointments, events or offerings that you may have registered for; (iii) to identify and authenticate your access to the parts of our Portal or other password-protected Online Services that you are authorized to access; (iv) to send you surveys; (v) for recruiting and human resources administration purposes; (vi) to protect our rights or our property and to ensure the technical functionality and security of our Online Services; and (vii) as required to meet our legal and regulatory obligations.

### **How We Disclose Personal Information**

We do not sell, lease, rent or otherwise disclose the Personal Information collected from our Site to third parties unless otherwise stated below or with your consent.

- **Our Third Party Providers.** We transfer Personal Information to third party service providers to perform tasks on our behalf and to assist us in providing our Online Services. For example, we may use third party service providers for security, website analytics, and payment processing. We use commercially reasonable efforts to only engage or interact with third party service providers who agree to limit re-disclosure of your Personal Information
- **Other Disclosures.** We may disclose Personal Information about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our terms of use; or (iii) detect, prevent, or otherwise address the security and functionality of our Online Services.

In addition to the uses and disclosures of information outlined above, if you use the Portal, your information may also be used and disclosed as follows:

- **Authorized Representatives.** If another individual is managing your account on your behalf (for example, a parent/legal guardian managing the account of a minor), as authorized by you or as a personal representative under applicable law, that person can view all Personal Information about you in the Portal.
- **Healthcare Providers.** Your healthcare providers may have access to Personal Information for administrative and healthcare Online Services. We may also use Personal Information to respond to and fulfill your requests.
- **Third-Parties.** We may share Personal Information with marketing, treatment or health care operations support partners, who are also required to protect the confidentiality of your information, that will enable them to send you targeted messages or serve you targeted advertising, which will occur with your authorization or otherwise in compliance with HIPAA (defined below) and other applicable laws.

### **Information Security**

No website can guarantee security, but we maintain appropriate physical, electronic, and procedural safeguards to protect your personal information collected via our Online Services in compliance with applicable law. Please see the Terms of Use available via the Website homepage (“Terms”) for more specific information about information security and your responsibilities.

### **What Can I Do to Protect My Privacy?**

Where you use a Portal or other service that is secured with a username and password, you are also responsible for taking steps to protect the privacy of Personal Information about you. In order to protect your privacy, you should:

- Never share your username or password.
- Always sign out when you are finished using the Portal.
- Use only secure web browsers.

- Employ common anti-virus and anti-malware tools on your system to keep it safe.
- Use a strong password with a combination of letters and numbers.
- Change your password often.
- Notify us immediately if you feel your login and/or password have been compromised at [insert email contact here]

### **Retention of Information**

We will retain Personal Information for the period necessary to fulfill the purposes for which it has been collected as described in this Privacy Policy unless a longer retention period is required by law.

Where practical, we dispose of certain categories of information, including Personal Information, on a regular schedule. For example, we dispose of web server logs after 90 days, information submitted through secure forms after 6 months, access and activity logs relating to the Portal after 1 year, and information collected for analytics purposes on the Website (e.g., information on pages visited on the Website) after 2 years.

### **User Communications**

- Email/messaging communications that you send to us via links on our Online Services may be shared with a customer service representative, employee, medical expert or agent that is most able to address your inquiry. We make every effort to respond in a timely fashion once communications are received. Once we have responded to your communication, it is discarded or archived, depending on the nature of the inquiry.
- The email/messaging function on our Online Services does not provide a completely secure and confidential means of communication. It is possible that your email communication may be accessed or viewed by another Internet user while in transit to us. If you wish to keep your communication private, do not use our email.

### **Personal Information**

If you are a Portal user, you may access and amend personal demographic information when logged into the Portal. If you would like to access, amend, erase, export, or object to or restrict the processing of other Personal Information collected via our Online Services, you may submit a request to: [Connie.Purcell@phminc.com](mailto:Connie.Purcell@phminc.com)

We will promptly review all such requests in accordance with applicable laws.

## **Communications Opt-Out**

We may send certain messages, including electronic newsletters, notification of account status, and marketing communications on a periodic basis. If you wish to be removed from such messages, you may request to discontinue future ones. All such material will have information as to how to opt-out of receiving it, although certain messages (such as a secure message sent by a provider or an account status update via the Portal), may be required and will not have opt-out capabilities.

## **HIPAA Policies**

If you are one of our patients, your personal information in our possession is protected health information ("PHI") protected by the Health Insurance Portability and Accountability Act of 1996, as amended ("HIPAA"), and the Health Information Technology for Economic and Clinical Health (HITECH) Act. In addition to this Privacy Policy, our HIPAA Notices of Privacy Practices apply to your PHI. The Notice of Privacy Practices is available online.

In collecting Personal Information, our Online Services may also collect PHI. We are committed to protecting your PHI. If there is a breach of your PHI, we are required by law to notify you. Your PHI will remain confidential, and will only be disclosed to you or your personal representative, unless otherwise required or permitted by applicable state or federal law. In all circumstances, unless otherwise required or permitted by law and/or our privacy policies, we will obtain your written authorization before using or disclosing your PHI.

## **Children's Privacy**

We will never ask for or knowingly collect Personal Information from children through the Online Services or Portal. If you are a child, you are not permitted to use the Portal and should immediately exit our Portal or get an adult. Parents of un-emancipated minors may set up accounts for themselves to access their children's medical records only as permitted pursuant to the Terms governing the Portal. If you think that we have collected personal information from a child through this Portal, please contact us at [Connie.Purcell@phminc.com](mailto:Connie.Purcell@phminc.com) and we will dispose of the information as required by applicable law.

## **Policy Changes**

We reserve the right to change the terms of this Privacy Policy at any time by posting those changes in revisions to this Privacy Policy, so that you are always aware of our processes related

to collection, use and disclosure of information. We urge you to check here for any updates to this Privacy Policy from time to time. Unless otherwise indicated, any changes to this Privacy Policy will apply immediately upon posting to the Website.

**What if I have questions or concerns regarding this Privacy Policy?**

If you have any questions or concerns about this Privacy Policy or the information practices of our Online Services, please contact us at: [Connie.Purcell@phminc.com](mailto:Connie.Purcell@phminc.com)

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