

Privacy Policy & HIPAA Notice of Privacy Practices

Effective Date: September 8, 2025

Part A: Website Privacy Policy

Clarus Health Inc. (“we,” “our,” or “us”) respects your privacy. This Website Privacy Policy explains how we collect, use, and protect information when you use our website, www.clarus-health.com (“Site”). By using this Site, you agree to the terms of this Policy.

1. Information We Collect

- **Personal Information:** When you submit information through our “Contact Us” form, request an appointment, sign up for our newsletter, or communicate with us, we may collect your name, email address, phone number, and other information you provide.
- **Non-Personal Information:** We automatically collect data such as IP address, browser type, and pages visited using cookies, analytics, and tracking technologies (including **Google Analytics, Facebook Pixel, and Google Ads**).

2. How We Use Information

We may use the information we collect to:

- Respond to your inquiries and requests
- Provide scheduling and related services through our partner **Boulevard**
- Improve website performance and user experience
- Analyze website traffic and trends via analytics tools
- Send newsletters and marketing communications (with opt-out option)
- Comply with legal obligations

3. Cookies & Tracking Technologies

We use cookies, pixels, and similar technologies to track activity on our Site. These tools help us understand how visitors use the Site and improve functionality. You may disable cookies through your browser settings, but some parts of the Site may not function properly.

California residents may opt out of targeted advertising (“sharing” of personal information under CPRA) by contacting us at info@clarus-health.com.

4. Third-Party Services and Widgets

Our Site may include links or embedded content from third parties (e.g., maps, videos, social media feeds). These third parties may collect information subject to their own privacy policies. Once you

leave our Site to access the **Boulevard** portal or another service, that service's privacy policy governs.

5. Disclosure of Information

We do not sell personal information. We may disclose information:

- To trusted third-party service providers who support our operations
- If required by law, subpoena, or government request
- To protect the rights, property, or safety of Clarus Health, our patients, or others

6. Data Retention

We retain personal information only as long as reasonably necessary to fulfill the purposes described in this Policy and as required by law. Certain health-related records may be retained for periods required by law, including the **California Confidentiality of Medical Information Act (CMIA)**.

7. California Privacy Rights

If you are a California resident, you may have rights under the **California Consumer Privacy Act (CCPA/CPRA)**, including the right to know what personal information we collect, request deletion of certain information, and opt out of the sale or sharing of personal information.

We do not sell or share personal information.

As required by **CalOPPA**, we disclose that our Site does not currently respond to "Do Not Track" signals.

We do not knowingly sell or share personal information of consumers under **16 years of age**.

8. Accessibility

We strive to make our website accessible to all users. If you encounter any difficulty accessing our Site, please contact our **Privacy Officer** at info@clarus-health.com or **(415) 237-3007**.

9. Children's Privacy

Our Site is not directed to children under 13, and we do not knowingly collect personal information from them. If you believe we have collected information from a child under 13, please contact us immediately.

10. Changes to This Policy

We may update this Privacy Policy from time to time. Updates will be posted on this page with a new “Effective Date.”

Part B: HIPAA Notice of Privacy Practices

This section describes how **Clarus Health Inc.** may use and disclose your **Protected Health Information (PHI)**, and your rights under HIPAA. We are required by law to maintain the privacy of PHI and provide you with this Notice.

1. Uses and Disclosures of PHI

We may use or disclose your PHI for the following purposes:

- **Treatment:** To provide your care, including sharing with providers, labs, pharmacies, or specialists.
- **Payment:** To bill insurance, obtain prior authorizations, and collect payment.
- **Healthcare Operations:** For quality improvement, compliance, audits, training, and legal purposes.
- **Controlled Substances:** To comply with California’s **CURES program** and other monitoring requirements.
- **Public Health & Oversight:** To report communicable diseases, adverse drug events, or as required for audits, inspections, investigations, and licensure.
- **Research:** We may use **de-identified PHI** for research or quality improvement without additional authorization.
- **Marketing & Testimonials:** We will not use PHI for marketing, testimonials, or photos without your **written authorization**.
- **Sale of PHI:** We will not sell your PHI without your **written authorization**.
- **Business Associates:** We may share PHI with third-party service providers (Business Associates) who perform functions on our behalf under contracts requiring them to safeguard PHI.
- **Legal Obligations:** When required by law, court order, or public health authority.

2. Patient Rights

You have the right to:

- Access and receive copies of your medical records, including electronic access through the **Boulevard patient portal**
- Request amendments to your PHI if you believe it is incorrect
- Request restrictions on certain uses or disclosures
- Request confidential communications (e.g., contact only by text or email)

- Receive an accounting of certain disclosures
- Request a paper copy of this Notice at any time
- File a complaint without fear of retaliation

3. Special Rules for Minors in California

In most cases, parents or guardians have access to their child's records. However, California law allows minors **12 years and older** to consent to certain care (e.g., reproductive health, mental health, or substance use treatment). In such cases, parents may not have access to those specific records.

4. Breach Notification

If we discover a breach of unsecured PHI, we will notify you **without unreasonable delay**, as required by law.

5. Data Security and Retention

We use reasonable physical, administrative, and technical safeguards to protect PHI. Records are retained as required by **federal and California law**.


6. Complaints


If you believe your privacy rights have been violated, you may file a complaint with us at **info@clarus-health.com** or with the **U.S. Department of Health and Human Services, Office for Civil Rights**. We will not retaliate against you for filing a complaint.

Contact Information

Clarus Health Inc.

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San Francisco, CA 94108

 info@clarus-health.com

 (415) 237-3007