Unified Privacy Policy & HIPAA Notice of Privacy Practices

(Effective Date: July 1, 2025)

Read me first. This consolidated document has two layers:

- Part A Privacy Policy (applies to all website/app visitors, prospective patients, and members under Utah Consumer Privacy Act (UCPA), California Consumer Privacy Act/CPRA, and similar state laws).
- Part B HIPAA Notice of Privacy Practices (NPP) (applies once you become a patient and we create or receive "protected health information" (PHI)).

Part A | Privacy Policy (UCPA / CCPA / CPRA & other state laws)

1. Introduction

Viteon Health, PLLC ("Viteon Health," "we," "our," or "us") operates www.viteonhealth.com and related sub-domains (the "Site") built on Webflow, plus mobile or web applications (collectively, the "Services"). This Privacy Policy explains how we collect, use, disclose, and safeguard information when you:

- browse public pages,
- schedule a consultation via our embedded widget, or
- receive marketing communications.

For questions, email info@viteonhealth.com.

2. Information We Collect

• Identifiers & contact data (name, email, phone, IP address).

- Device & usage data (browser type, referring URLs, page views, cookies, device IDs).
- Form submissions & scheduling details (reason for visit, preferred date/time).
- Marketing data (engagement with emails, ads, social media).
- Our Services are not directed at children under 13 and we do not knowingly collect personal information from them.

Note: Once you become a patient, those records may be PHI—see Part B.

3. Legal Bases / How We Use Info

Purpose	Basis (UCPA/CPRA)	Examples
Provide & secure the Site	Contract / Legitimate interests	Load pages, diagnose errors, fraud prevention
Schedule visits & send confirmations	Contract / Consent	Calendar reminders, pre-visit instructions
Marketing & analytics	Consent (where required)	Newsletters, retargeting ads
Regulatory compliance	Legal obligation	Record-keeping, FTC/CAN-SPAM

4. Sharing & Business-Associate Agreements

We share data only with:

- **Service providers** (Webflow, Stripe, Twilio, Google Workspace) bound by contract to use it solely for our instructions.
- Analytics & ad-tech tools (Google Analytics 4, Meta Pixel) after IP-masking and parameter filtering. We do not sell or "share" PHI for cross-context behavioral advertising.
- **Business associates** (listed in Part B) who sign HIPAA BAAs when they may access PHI.

5. Tracking Technologies

We deploy cookies, GA4, and Meta Pixel to understand traffic and improve ads.

- **De-identification steps:** IP anonymization, suppression of query-string parameters containing name, email, or diagnosis codes.
- Opt-out: Visit our "Cookie Settings" banner or use the Global Privacy Control signal.
 California & Utah residents may also submit a "Do Not Sell/Share" request at privacy@viteonhealth.com.
- We never embed Meta Pixel or GA4 on patient-portal or payment pages.

6. Your Rights

Jurisdiction Rights

UCPA (Utah) Access • Deletion • Portability • Appeal adverse decision

CCPA/CPRA (California) Access • Correct • Delete • Opt-out of sale/share • Limit SP

use

Colorado / Virginia / Others Similar rights; see state addenda below

Submit requests via <u>info@viteonhealth.com</u>. Within 45 days you will receive an email with a secure form to complete, followed by confirmation of identity, and response.

7. Security & Retention

We follow **NIST 800-53** and **ISO/IEC 27001** controls (encryption in transit & at rest, role-based access, annual penetration testing). Non-patient data is retained for up to seven years, unless longer retention is required for audits or litigation. Any breach involving consumer data will be notified within the timelines of Utah's Data Breach Notification Act or other applicable laws.

8. State-Specific Addenda

Click below for disclosures tailored to residents of California, Colorado, Utah, Virginia, Connecticut, and Nevada.

9. Changes & Contact

We may update this Privacy Policy from time to time. Material changes will be emailed to subscribers and signaled by a banner on the Site at least 15 days before taking effect. Direct all questions to info@viteonhealth.com. Indicate "Privacy" on the subject line.

Part B | HIPAA Notice of Privacy Practices (NPP)

1. Purpose & Covered-Entity Status

Viteon Health, PLLC is a *covered entity* under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). This Notice describes how medical information about you may be used and disclosed and how you can access this information.

2. Protected Health Information (PHI) We Maintain

- Demographics (name, DOB, address)
- Medical history, labs, imaging, vitals
- Billing & payment data
- Communications with your care team
- Membership records in our concierge program

3. How We Use/Disclose PHI

Category	Examples	Authorization Needed?
Treatment	Telehealth visits, e-prescribing, care coordination	No
Payment	Billing insurers, eligibility checks	No
Health-care Operations	Quality improvement, audits, customer service	No
Required Disclosures	HHS/OCR investigations, public-health reporting, law enforcement with court order	No

Optional / Other Marketing materials, sale of PHI, most research Yes, written authorization

You may revoke an authorization at any time in writing.

4. Business Associates & Other Sharing

We contractually bind all third parties that create, receive, or transmit PHI on our behalf (e.g., Canvas Medical EHR, AWS Cloud, Paubox email, Truepill pharmacy). Business-associate contracts limit their use/disclosure and require HIPAA-level safeguards. We may also share PHI with health information exchanges (HIEs) unless you opt out.

5. Tracking Technologies & PHI

We **do not** use Meta Pixel, Google Analytics, or similar tools on authenticated patient pages unless we obtain (i) a HIPAA-compliant BAA with the vendor *or* (ii) your explicit written authorization.

6. Your HIPAA Rights

- Inspect & obtain a copy of your records (usually within 30 days).
- Request amendment of inaccurate or incomplete PHI.
- Request restrictions on certain uses/disclosures.
- Receive confidential communications (alternate address/phone).
- Receive an accounting of certain disclosures.
- Receive notice of a breach affecting your PHI.
- **File a complaint** with us or with HHS OCR without retaliation. Submit requests to **info@viteonhealth.com**.

7. Safeguards, Breaches & Retention

We employ encryption, multi-factor authentication, least-privilege access, and continuous monitoring. If a breach of unsecured PHI occurs, we will notify you in writing without

unreasonable delay and in no case later than 60 days, per HIPAA/HITECH. Clinical records are retained for at least 10 years (or longer if required by Utah law).

8. Revisions to This Notice

We reserve the right to change this Notice. Any new Notice will be effective for all PHI we maintain and will be posted on our Site and in our patient portal with the new effective date.

9. Questions & Complaints

Contact our **Privacy Officer** at **info@viteonhealth.com**.

If you believe your privacy rights have been violated, you may file a complaint with the Secretary of the U.S. Department of Health and Human Services, Office for Civil Rights, 200 Independence Ave. SW, Washington DC 20201, or by calling (800) 368-1019.

© 2025 Viteon Health, PLLC. All rights reserved.