

Privacy Policy

1. Purpose

This document summarizes the permitted uses and disclosures of patient protected health information (“PHI”) as permitted by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) Standards for Privacy of Individually Identifiable Health Information (the “Privacy Rule” or the “HIPAA Privacy Rule”), as amended by the Health Information Technology for Economic and Clinical Health Act, which is at Section 13400, et seq. of the American Recovery and Reinvestment Act of 2009, 42 U.S.C. § 17921, et seq., (the “HITECH Act”) and any regulations promulgated thereunder, including the HIPAA omnibus final rule (the “HIPAA Final Rule”).

2. Scope

This policy applies to all Company staff members.

3. Privacy Policy Statement

The Company is committed to complying with the Privacy Rule.

The Company recognizes the need to protect the privacy of PHI in order to facilitate the effective delivery of health care. These Privacy Policies and Procedures are designed and intended to ensure^[1] the Company’s compliance with the Privacy Rule. The Company adopts these Policies and Procedures to protect the PHI that it creates and maintains from unauthorized use, disclosure, or access, and to maintain the confidentiality and integrity of that PHI. These Policies and Procedures also ensure that individuals have rights related to their PHI.

Through the Company's Notice of Privacy Practices ("Privacy Notice") individuals are informed of the Company's legal duties and these Policies and Procedures, as well as their individual rights with respect to their PHI.

4. Key Definitions

"Protected Health Information" is information that (1) identifies (or could be reasonably used to identify) an individual, (2) is created or received by a HIPAA covered entity (a health care provider, health plan or health care clearinghouse) and (3) relates to the past, present or future physical or mental health of the individual, the provision of health care to the individual, or the past, present or future payment for the provision of health care to the individual.

A "Business Associate" is a person or entity, other than a member of a covered entity's workforce, that creates, receives, maintains or transmits PHI on behalf of a covered entity for a function or activity regulated by HIPAA. The HIPAA Final Rule expands the definition of "business associate" to include subcontractors to a business associate that create, receive, maintain or transmit PHI on behalf of a business associate. Business associate functions or activities on behalf of a covered entity include claims processing or administration, data analysis, processing or administration, utilization review, quality assurance, billing, benefit management, practice management and repricing.

These Policies and Procedures will be amended and/or supplemented as necessary and appropriate to comply with changes in the law or regulations or other interpretation of the Company's privacy-related obligations, or to reflect changes related to the Company. The Company will document and implement changes to these Policies and Procedures whenever there is a change in the law, regulations or interpretation of the Company's privacy obligations and/or a material change to the uses or disclosures of PHI or other privacy practices that necessitate a change in these Policies and Procedures. If a change requires revisions to the Privacy Notice, the Company will not implement the change before the effective date of the revised Privacy Notice unless the Privacy Officer deems it necessary to apply the change to PHI that the Company created or received before this effective date.

These Policies and Procedures are effective as of July 03, 2025.

[1] The term “ensure,” as used throughout these Policies and Procedures, is not meant to guarantee compliance with the Privacy Rule. Rather, “ensure” shall mean that the Privacy Officer, Business Associates and others, as applicable, will use their best efforts to comply with the Privacy Rule.