



Healthwise Privacy Policies
Healthwise Behavioral Health & Wellness
Effective date: January 2010

This document brings together our clinical privacy notice, SMS texting privacy policy, and Wellness Studio and app privacy policy. Each part applies to the services you use. Receiving this document does not enroll you in texting or studio marketing.

1. Clinical Notice of Privacy Practices

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.

About this notice

This notice applies to clinical services provided through Healthwise Behavioral Health & Wellness (“Healthwise,” “we,” or “us”). Protected health information is information that identifies you and relates to your health, care, or payment for care. It includes clinical and billing records.

Our responsibilities

We must protect the privacy of your protected health information, provide this notice, and follow its terms while it is in effect. We maintain safeguards for your information and will notify you as required by law if a breach of unsecured protected health information occurs.

We follow HIPAA and applicable Minnesota law. When another applicable law provides greater protection or requires additional consent, we follow that law. Receiving or acknowledging this notice does not itself authorize disclosure of your records.

Your rights

Get a copy of your records

You may ask to inspect or receive a paper or electronic copy of medical and billing information used to make decisions about you. Contact us for instructions. We generally act within 30 days, or sooner when applicable law requires. If a legally permitted extension is necessary, we will explain it in writing.

Fees, if any, will comply with applicable law. Certain information, including separately maintained psychotherapy notes, may be excluded from access. If access is denied, we will explain the reason and any available review rights.

Request a correction

You may submit a written request explaining why information is inaccurate or incomplete. We generally respond within 60 days, with any extension allowed by law explained in



writing. We may deny a request for reasons permitted by law. If denied, we will explain why and how you may submit a statement of disagreement.

Choose how we contact you

You may ask us to contact you in a particular way or at a different address or telephone number, including for billing. We will accommodate reasonable requests. Tell us if voicemail, text messages, email, or mail at your usual contact information could compromise your privacy.

Ask us to limit sharing

You may ask us to restrict use or disclosure for treatment, payment, or operations, or sharing with people involved in your care. We are not required to accept every request unless applicable law requires it. We will follow restrictions we accept, subject to legal exceptions such as necessary emergency treatment.

If a service is paid out of pocket in full and you request that we not disclose information about that service to your health plan for payment or health care operations, we must honor the request unless disclosure is required by law. Tell us before a claim is submitted so we can implement the restriction.

Get a list of certain disclosures

You may request an accounting of certain disclosures made during the six years before your request. HIPAA excludes some disclosures, including most for treatment, payment, operations, and disclosures made with your authorization. Other applicable law may provide additional rights.

The first accounting in a 12-month period is free. We may charge a reasonable, cost-based fee for additional accountings, after notifying you and allowing you to withdraw or modify the request.

Get a copy of this notice

You may request a paper copy at any time, even if you previously agreed to electronic delivery. The current notice will also be available at our office and on our website.

Choose someone to act for you

A legally authorized representative may exercise rights on your behalf within the scope of that authority. We will verify the authority and apply any legal exceptions before providing access or accepting instructions.

File a complaint without retaliation

You may complain to our privacy official using the contact information in the Questions requests and complaints section. We will not retaliate against you.



You may also complain to the U.S. Department of Health and Human Services, Office for Civil Rights: <https://www.hhs.gov/hipaa/filing-a-complaint/index.html>

A complaint to Healthwise is not required before contacting HHS. HHS complaints generally must be filed within 180 days of learning of the issue; HHS may extend that deadline for good cause.

Privacy for children and adolescents

Parent or guardian access depends on the child's legal circumstances, how services were authorized, custody or court orders, and applicable law. It is not an automatic right to every record in every case.

Minnesota law permits minors age 16 or older to consent independently to certain nonresidential mental health services. Other exceptions also apply. We follow applicable rules for consent, record access, parental notification, and safety-related disclosures, and explain these as relevant to your care.

How we use and share your information

The categories below explain how we may use or share your information. We follow applicable consent requirements and legal limits. Permission under HIPAA does not override Minnesota law. We obtain written consent when required, unless a specific legal exception applies.

Treatment

We use information to assess your needs and provide therapy, medication management, testing, and related clinical care. Where authorized or otherwise permitted by law, we share relevant information with professionals involved in your treatment, consultation, or referral. For example, your therapist and psychiatric provider may coordinate care when the applicable consent or legal requirements are met.

Payment

We use and, where authorized or legally permitted, disclose information to determine coverage, submit claims, obtain reimbursement, and manage billing. For example, an insurer may receive your identifying information, diagnosis, and services billed to process a claim.

Health care operations

We use and, where authorized or legally permitted, disclose information for practice administration, quality improvement, professional supervision, credentialing, audits, compliance, and similar operations.

Contracted service providers may assist with records, billing, communications, technology, or other functions. We require appropriate privacy agreements, including business associate agreements when required.

**Appointments and care related messages**

We may contact you about appointments, forms, post-visit instructions, billing notifications, payment reminders or links, and other care-related matters through methods permitted by law and consistent with your communication preferences and applicable consent.

We use InSync for billing text messages and Curogram for care-related texting and forms. Standard text messages (SMS) and ordinary email may carry privacy risks. You may request another communication method. Agreeing to care-related texts does not enroll you in studio promotional messages.

2. Privacy and choices for billing, care-related, and studio text messages.

Part 3 explains privacy for the Wellness Studio, Walla booking tools, and Healthwise Wellness Studio app. Those sections supplement this clinical notice and do not reduce your clinical privacy protections.

Family, caregivers, and disaster relief

We may share information relevant to another person's involvement in your care or payment only with appropriate permission or as otherwise permitted by law. When required, we give you an opportunity to agree or object. Special conditions may apply to Minnesota mental health records.

If you cannot express a preference, limited disclosures may be permitted based on professional judgment, your interests, and applicable law. We do not assume that being a relative automatically entitles someone to your records.

Other disclosures allowed or required by law

- Subject to applicable consent, confidentiality, and procedural requirements, we may use or disclose information for:
- Required reporting of suspected child abuse or neglect or maltreatment of vulnerable adults.
- Public health reporting, medication safety, and other authorized public health activities.
- Preventing or reducing a serious threat to health or safety, or fulfilling a legal duty to protect.
- Health oversight, licensing, audits, investigations, and other authorized regulatory activities.
- Court orders, subpoenas, or other legal proceedings only when the applicable conditions for disclosure are satisfied.
- Law enforcement, workers' compensation, or specified government functions when permitted or required.



- Coroners, medical examiners, funeral directors, or organ procurement organizations when authorized.
 - Research when required authorization, consent, or an applicable legal exception is in place.
- HHS review of our compliance with federal privacy requirements.

We limit information as required by law. These categories do not create an unrestricted right for an agency, insurer, family member, or other requester to obtain your records.

When we need your written authorization

We obtain your written authorization for uses or disclosures not otherwise authorized or permitted by law. These include most uses or disclosures of separately maintained psychotherapy notes, marketing uses of protected health information requiring authorization, and disclosures constituting a sale of protected health information.

Psychotherapy notes have a specific legal meaning and are not the same as ordinary progress notes or the full treatment record. Legal exceptions to the authorization requirement may apply.

You may revoke an authorization in writing. Revocation does not undo actions already taken in reliance on it. Additional limits may apply where an insurer has legal rights to contest a claim or policy.

Clinical information will not be used for studio promotional outreach without the permission required by applicable law. Optional studio marketing enrollment is separate from consent to clinical care and care-related texts.

Substance use disorder records

Some substance use disorder records are subject to additional federal protections under 42 CFR Part 2. Not every behavioral health record is a Part 2 record.

To the extent Healthwise holds Part 2 records, we follow the additional applicable consent and disclosure restrictions. Such records cannot be used or disclosed in civil, criminal, administrative, or legislative investigations or proceedings against you without your written consent or a qualifying court order and subpoena or similar legal mandate. A subpoena alone is not sufficient.

Changes to this notice

We may change this notice when permitted by law. Revised terms may apply to information we already hold as well as information collected later. We will post the revised notice on our website, make it available at our office and upon request, and identify its effective date.



Questions, requests and complaints

To ask about this notice, exercise a privacy right, or make a complaint, contact our office and ask for the privacy official. Please do not include sensitive clinical details in ordinary email.

Privacy contact: Healthwise Management
Healthwise Behavioral Health & Wellness
11280 86th Avenue North, Maple Grove, MN 55369
Phone: 763-400-7828 | Fax: 763-400-7444
Email: info@HealthwiseMN.com | Website: www.HealthwiseMN.com

2 SMS Texting Privacy Policy

This part covers billing and care-related texts through InSync and Curogram and studio texts through Walla or our studio messaging tools. Our separate Terms of Service describe SMS program terms.

Messages you may receive

With your permission, we may send billing notifications, balance and payment reminders, payment links, appointment reminders, scheduling updates, intake or form links, and other administrative messages related to your care. Studio texts may include booking, purchase, and schedule notices. Optional promotional texts may include studio events, classes, workshops, and offers only when you separately opt in. Messages may be automated.

Your permission and choices

We obtain permission through an SMS consent option or another documented opt-in. Acknowledging this notice does not enroll you in texts. Texting is optional, is not a condition of care or purchase, and has alternatives. Studio promotional texts require a separate opt-in.

Information we collect and use

We collect and use your mobile number, identifying information needed to communicate with you, message content and replies, consent and opt-out records, and available delivery information. We use this information to provide and manage the messaging program, respond to requests, document communications, and meet applicable legal obligations.

How we protect and share texting information

We do not sell your mobile information or share it with third parties or affiliates for marketing or promotional purposes. We do not sell or share SMS opt-in data or consent for purposes unrelated to providing this messaging program. We may share information with service providers that support message delivery, such as messaging platforms and telecommunications providers, as necessary to operate the program. Clinical information



remains subject to the protections and legally permitted disclosures described in the clinical notice.

Frequency charges and delivery

Message frequency varies by program and your appointments, billing activity, studio enrollment, and communication needs. Message and data rates may apply. Delivery is not guaranteed; wireless carriers are not liable for delayed or undelivered messages.

Stop messages or get help

Reply STOP to the number sending a message to opt out of that texting program. You may also call 763-400-7828 to request help stopping Healthwise texts across our systems. Reply HELP for help or call 763-400-7828. Opting out of texts does not cancel appointments or change payment obligations. Tell us if your mobile number changes.

Privacy and urgent needs

Standard SMS is not a secure patient portal. Messages may be visible to others who can access your phone or account. Avoid sending sensitive clinical details, insurance card images, or payment card details by ordinary text; use the secure forms or payment links we provide. Text messages are not monitored continuously and must not be used for emergencies. For an emergency, call 911. For privacy questions, contact our privacy official using the contact details above.

3. Wellness Studio and App Privacy Policy

This part explains how Healthwise handles information for Wellness Studio classes, workshops, groups, wellness appointments, purchases, and communications through our studio, Walla booking tools, and the Healthwise Wellness Studio app. Walla Software, Inc. provides the platform. It has its own privacy policy for its processing of information.

Information provided for studio services

Depending on the service and features you use, information may include your name, contact details, account information, date of birth or age eligibility, bookings, attendance, purchases, payment transaction information, signed waivers, communication preferences, and messages or feedback. If you provide accessibility needs, limitations, or other health-related information relevant to participation, we use it for that purpose. Please provide only information needed for your request or service.

Device information and app features

Walla reports that its services may collect device and browser information, IP addresses, usage and log information, and information through cookies or similar technologies. The information collected depends on the platform and features used. Device permission prompts govern access to optional features when offered. You can manage available app permissions and push notifications in your device settings; some features may not function when permissions are disabled.

**How information is used**

We use studio information to create and manage accounts, arrange bookings, record attendance, process purchases and payments, administer passes or plans, communicate about services, respond to questions, support participation, maintain security, and meet legal obligations. We use communication preferences to manage optional outreach. Any additional use requiring consent will be explained when permission is requested.

Sharing for studio operations

We share relevant information with Walla, payment processors, communications or technology providers, and instructors or practitioners as needed to provide the service or support operations. For example, an instructor may receive an attendance list and participation information relevant to a class. Disclosures required by law or necessary to address fraud or safety are subject to applicable legal limits. We do not sell your mobile information or share it with third parties or affiliates for their marketing or promotional purposes. SMS consent information is subject to Part 2.

Relationship to clinical services

A studio account, booking, or marketing subscription does not authorize us to transfer your clinical record into Walla or use clinical information for studio promotions. If a service involves clinical care or protected health information, Part 1 and applicable law continue to apply. Studio records are not automatically treated as clinical records solely because Healthwise offers both services. Use the clinical intake and communication channels for clinical records and treatment questions.

Wellness Studio privacy choices and requests**Communication preferences**

Service notices may concern bookings, purchases, or schedule changes, consistent with your permissions and law. Studio promotional SMS requires a separate opt-in. Unsubscribe from promotional emails through the email link, reply STOP to studio texts, and manage push notifications in device settings. Contact us for help updating preferences across channels.

Access corrections and account deletion

You may review available account details through the booking tools or contact Healthwise to request access, correction, account deletion, or deletion of associated personal information. Email info@HealthwiseMN.com or call 763-400-7828. Identify the request as a Wellness Studio or app privacy request and provide contact details sufficient for us to locate your account; do not send sensitive clinical or payment information in ordinary email. We may verify your identity or representative authority.

We will coordinate with Walla and relevant service providers to address a verified request. You may also use any deletion option available in the app or contact Walla at



support@hellowalla.com. Uninstalling the app does not delete your account. Account deletion does not by itself cancel a recurring plan, resolve a balance, or erase records we must lawfully retain; contact us about associated bookings or plans. Clinical record access and correction requests follow Part 1.

Retention and deletion

We retain studio account, booking, transaction, waiver, and communication information for as long as reasonably needed to provide services, administer purchases, satisfy legal or accounting requirements, document permissions and participation, and resolve disputes. Retention varies by record type. When information is no longer needed and retention is not legally required, we delete it or deidentify it through applicable systems. Some records may remain in protected backups or with vendors for their applicable retention periods. For a deletion request, we will explain any information retained and the reason. We may retain a limited opt-out record to honor your communication choices.

Security and payment information

We use reasonable administrative, technical, and physical safeguards and limit access according to work responsibilities. Payment tools process payment details under their security procedures; do not submit full card numbers in ordinary messages. Walla describes safeguards for its services, including encryption of payment transactions in transit. No internet transmission or storage method is completely secure. Protect your login and device and contact us if you suspect unauthorized access.

Children and families

Parents or guardians should arrange registration for children's studio programs through the appropriate studio process. A child's eligibility for a program does not authorize a child to create a Walla account contrary to platform age restrictions. If you believe a child provided account information without appropriate permission, contact us so we can coordinate a review with Walla.

Walla policy changes and privacy contact

Walla's policy at <https://www.hellowalla.com/privacy-policy> describes its practices and does not replace our responsibilities. We will identify a revised effective date when updating this document. For requests, call 763-400-7828 or email info@HealthwiseMN.com and ask for the privacy official. Our mailing address and privacy contact appear in Part 1.