

## 24HR VIRTUAL CLINIC LLC PRIVACY POLICY

This notice describes how your protected personal health related information ("PPHRI") about you may be used, how it may be disclosed and how you can obtain access to this information. This page will serve as a summary of your privacy rights. The law (45 CFR Part 160 and Part 164, Subparts A and E) requires that your PPHRI be kept private. We must give you this Notice about our privacy practices and follow the terms of this Notice while it is in effect. Your use of 24hr Virtual Clinic LLC Services indicates your acceptance of the terms of this Notice. PLEASE REVIEW IT CAREFULLY. Effective January 1, 2018. Last Revised: March 1, 2020.

### 24hr Virtual Clinic Commitment to Privacy

24hr Virtual Clinic LLC Services, herein referred to as "24hr Virtual Clinic™" or "Responders 1<sup>st</sup> Call™", and all service providers of 24hr Virtual Clinic LLC (here after referred to as "24VC"), are dedicated to maintaining the privacy of your PPHRI. PPHRI is information about you that may be used to identify you (such as your name, social security number or address), and that relates to (a) your past, present or future physical or mental health or condition, (b) the provision of health care to you, or (c) your past, present, or future payment for the provision of health care. In conducting its business, 24VC will receive and create records containing your PPHRI. 24VC is required by law to maintain the privacy of your PPHRI and to provide you with notice of its legal duties and privacy practices with respect to your PPHRI.

24VC must abide by the terms of this Notice while it is in effect. 24VC reserves the right to change the terms of this Notice at any time, as long as the changes are in compliance with applicable law. If 24VC changes the terms of this Notice, the new terms will apply to all PPHRI that it maintains, including PPHRI that was created or received before such changes were made. If 24VC changes this Notice, it will post the new Notice on its Web site and will make the new Notice available upon request.

### PPHRI Uses and Disclosures

24VC may use and disclose your PPHRI in the following ways:

1. **Treatment, Payment and Health Care Operations.** 24VC is permitted to use and disclose your PPHRI for purposes of (a) treatment, (b) payment and (c) health care operations. For example:
  - **Treatment.** 24VC may disclose your PPHRI to another physician or health care provider for purposes of a consult or in connection with the provision of follow-up treatment.
  - **Payment.** 24VC may use and disclose your PPHRI to your health insurer or health plan in connection with the processing and payment of claims and other charges.
  - **Health Care Operations.** 24VC may use and disclose your PPHRI in connection with its health care operations, such as providing customer services and conducting quality review assessments. 24VC may engage third parties to provide various services for 24hr Virtual Clinic™ or Responders 1<sup>st</sup> Call™. If any such third party must have access to your PPHRI in order to perform its services, 24VC will require that third party to enter an agreement that binds the third party to the use and disclosure restrictions outlined in this Notice.
2. **Authorization.** 24VC is permitted to use and disclose your PPHRI upon your written authorization, to the extent such use or disclosure is consistent with your authorization. You may revoke any such authorization at any time.
3. **As Required by Law.** 24VC may use and disclose your PPHRI to the extent required by law.

### Unique or Special Circumstances

The following categories describe unique or special circumstances in which 24VC may use or disclose your PPHRI:

1. **Public Health Activities.** 24VC may disclose your PPHRI to public health authorities or other governmental authorities for purposes including preventing and controlling disease, reporting child abuse or neglect, reporting domestic violence and reporting to the Food and Drug Administration regarding the quality, safety and effectiveness of a regulated product or activity. 24VC may, in certain circumstances disclose PPHRI to persons who have been exposed to a communicable disease or may otherwise be at risk of contracting or spreading a disease or condition.
2. **Workers' Compensation** Workers' Compensation. 24VC may disclose your PPHRI as authorized by, and to the extent necessary to comply with, workers' compensation programs and other similar programs relating to work-related illnesses or injuries.
3. **Health Oversight Activities.** 24VC may disclose your PPHRI to a health oversight agency for authorized activities such as audits, investigations, inspections, licensing and disciplinary actions relating to the health care system or government benefit programs.
4. **Judicial and Administrative Proceedings.** 24VC may disclose your PPHRI, in certain circumstances, as permitted by applicable law, in response to an order from a court or administrative agency, or in response to a subpoena or discovery request.
5. **Law Enforcement.** 24VC may, under certain circumstances, disclose your PPHRI to a law enforcement official, such as for purposes of identifying or locating a suspect, fugitive, material witness or missing person.
6. **Decedents** 24VC may, under certain circumstances, disclose PPHRI to coroners, medical examiners and funeral directors for purposes such as identification, determining the cause of death and fulfilling duties relating to decedents.
7. **Organ Procurement.** 24VC may, under certain circumstances, use or disclose PPHRI for the purposes of organ donation and transplantation.
8. **Research.** 24VC may, under certain circumstances, use or disclose PPHRI that is necessary for research purposes.

9. **Threat to Health or Safety.** 24VC may, under certain circumstances, use or disclose PPHRI if necessary, to prevent or lessen a serious and imminent threat to the health or safety of a person or the public.
10. **Specialized Government Functions.** 24VC, may in certain situations, use and disclose PPHRI of persons who are, or were, in the Armed Forces for purposes such as ensuring proper execution of a military mission or determining entitlement to benefits. 24VC may also disclose PPHRI to federal officials for intelligence and national security purposes.

## Your Personal Rights Regarding Your PPHRI

You have the following rights regarding the PPHRI maintained by 24VC:

1. **Confidential Communication.** You have the right to receive confidential communications of your PPHRI. You may request that 24VC communicate with you through alternate means or at an alternate location, and 24VC will accommodate your reasonable requests. You must submit your request in writing to 24VC.
2. **Restrictions.** You have the right to request restrictions on certain uses and disclosures of PPHRI for treatment, payment or health care operations. You also have the right to request that 24VC restrict its disclosures of PPHRI to only certain individuals involved in your care or the payment of your care. You must submit your request in writing to 24VC. 24VC is not required to comply with your request. However, if 24VC agrees to comply with your request, it will be bound by such agreement, except when otherwise required by law or in the event of an emergency.
3. **Inspection and Copies.** You have the right to inspect and copy your PPHRI. You must submit your request in writing to 24VC. 24VC may impose a fee for the costs of copying, mailing, labor and supplies associated with your request. 24VC may deny your request to inspect and/or copy your PPHRI in certain limited circumstances. If that occurs, 24VC will inform you of the reason for the denial, and you may request a review of the denial.
4. **Amendment.** You have a right to request that 24VC amend your PPHRI if you believe it is incorrect or incomplete, and you may request an amendment for as long as the information is maintained by 24VC. You must submit your request in writing to 24VC and provide a reason to support the requested amendment. 24VC may, under certain circumstances, deny your request by sending you a written notice of denial. If 24VC denies your request, you will be permitted to submit a statement of disagreement for inclusion in your records.
5. **Accounting of Disclosures.** You have a right to receive an accounting of all disclosures 24VC has made of your PPHRI. However, that right does not include disclosures made for treatment, payment or health care operations, disclosures made to you about your treatment, disclosures made pursuant to an authorization, and certain other disclosures. You must submit your request in writing to 24VC and you must specify the time period involved (which must be for a period of time less than six years from the date of the disclosure). Your first accounting will be free of charge. However, 24VC may charge you for the costs involved in fulfilling any additional request made within a period of 12 months. 24VC will inform you of such costs in advance, so that you may withdraw or modify your request to save costs.
6. **Paper Copy.** You have the right to obtain a paper copy of this Notice from 24VC at any time upon request. To obtain a paper copy of this notice, please contact 24VC by calling 855-450-4141.
7. **Complaint.** You may complain to 24VC and to the Secretary of the Department of Health and Human Services if you believe that your privacy rights have been violated. To file a complaint with 24VC, you must submit a statement in writing to 24VC: Attn: Customer Service Manager, P.O. Box 3915, Lake Worth Beach, FL 33465. 24VC will not retaliate against you for filing a complaint.

## Further Information

If you would like more information about your privacy rights, please contact 24VC by calling 855-450-4141 and ask to speak to the Customer Service Manager. To the extent you are required to send a written request to 24VC to exercise any right described in this Notice, you must submit your request to 24hr Virtual Clinic Attn: Customer Service Manager, P.O. Box 3915, Lake Worth Beach, FL 33465.

## Acceptance

By using this site and 24VC Services, you acknowledge your acceptance of 24VC privacy policy and agree to the terms described herein. You should not use 24VC Services if you do not agree with this policy. It is recommended that you read this privacy policy before use of Services to ensure that you have not missed any changes to the privacy policy. Your continued use of the Services following any changes to the privacy policy signifies your acceptance of those changes.