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| Policy & Procedure | | | |
| Title: | Omnicare Medical Group Website Privacy Policy | | |
| Policy #: | HS-PRV-004 | | |
| Issuing Dept.: | Office of Compliance and Risk Management | Effective Date: | 01/01/2023 |
| Approved by: | Board of Directors | Revision Date: | |
| Distribution: | <input type="checkbox"/> Omnicare Medical Group | Review Date: | |

Contact information

- For further information on this policy, contact the Privacy Office within the Office of Compliance and Risk Management.

Purpose

1. INTRODUCTION

This Omnicare Medical Group Website Privacy Policy (“Privacy Policy”) applies to personal information created, received, maintained or transmitted by or to the Omnicare Medical Group Website (“Website”), which is operated by Omnicare Medical Group (“OMG”, “we”, “us”, “our”). This Privacy Policy explains our practices and governs the use of personal information OMG creates, receives, maintains or transmits from you or about you through the Website.

For information on our collection of geolocation, see section 3.B, “Information We Collect Automatically” and section 4, “Website Permissions.” If you do not agree with our policies and practices, do not download, register with, or use this Website. By downloading, registering with, or using this Website, you agree to this Privacy Policy.

Note that this Website is hosted through a third party service provider. Such service provider may view personal information as part of providing its hosting services to OMG. Moreover, any information created, received, maintained or transmitted by or through the Website may be considered protected health information, as governed by the Health Insurance Portability and Accountability Act (“HIPAA”), Health Information Technology for Economic and Clinical Health Act of 2009 (“HITECH”), and applicable state law. Please refer to our Notice of Privacy Practices for more information on how OMG uses and/or discloses protected health information.

Policy

1. CHILDREN’S PERSONAL INFORMATION

The Website is intended for a general audience and not directed to children under 17 years of age. Minors cannot create a Website account at this time. As a non-profit organization, OMG’s collection of children’s personal information is not governed by the U.S. Children’s Privacy Protection Act (“COPPA”).

2. INFORMATION WE COLLECT

- Information You Submit

- 2.1.1. We, and our vendors, may obtain personal information that you provide to us directly such as data you submit when you complete forms, fill out surveys, schedule appointments, request prescription refills, send messages to your care team, or make payments through the Website. Personal information we, and our vendors, collect may include your name, account credentials, residential address, email address, phone number, gender identity, sexual orientation, marital status, race, ethnicity, language, religion, emergency contacts, caregiver information, scheduling preferences, photo, insurance coverage information (including insurance card photos, claims, and referrals), pharmacy information, certain health-related information, financial or social assistance-related information, and payment processing information.
- 2.1.2. If you submit the personal information of another person, you represent that you have obtained the authorization from that person to submit such personal information to us.

2.2. Information We Collect Automatically

- 2.2.1. We or our vendors may use a variety of tracking technologies that automatically collect certain information whenever you interact with the Website. This may include usage details related to your access to and use of the Website, including traffic data, location data, logs, crash analytics, and/or other communication data and the resources that you access and use on or through the Website, as well as device information such as internet connection information, the device's unique device identifier, IP address, geolocation (to the extent it is not restricted by your Website permissions), operating system, browser type, and mobile network information.
- 2.2.2. The Website may be personalized based on various information we may have about you to provide you with more location-relevant content. To the extent it is not restricted by your Website permissions, we may use GPS (global positioning systems) software, geo-filtering, and other location-aware technologies to locate you, sometimes precisely, for purposes such as verifying your location and delivering or restricting content based on your location. You may use your device settings to change your geolocation preferences.
- 2.2.3. We may combine certain automatically-collected information with other information we obtain about you, which may include data we obtain from third parties. We or third parties, including our vendors, may collect personal information about your online activities over time and across different online services when you use the Website.

3. WEBSITE PERMISSIONS

- 3.1. Depending on your device or Website permission settings, the Website may have access to the following information from your device:
 - 3.1.1. **Location** (in the future, we may include precise or approximate location, including access to location in the background in case patients seek assistance in locating services)
 - 3.1.2. **Storage** (the Website may be able to read, modify, or delete the contents of your shared storage)
 - 3.1.3. **Camera** (may allow the Website to take pictures and videos)
 - 3.1.4. **Microphone** (may record audio)

- 3.1.5. **Phone** (may directly call phone numbers),
- 3.1.6. **Other information** (for example, the Website may be able to run foreground service, access Bluetooth settings and pair with Bluetooth devices, control vibration, run at startup, have full network access, use device security hardware such as fingerprint login, view network connections, prevent phone from sleeping, change audio settings, and receive data from Internet)
- 3.2. These Website permission settings allow you to access or use certain features within the Website. By changing your Website permission settings, you may affect your ability to access or use certain features on the Website.
- 3.3. Additionally, you may be able to log into the Website using your device's security features such as using a passcode or your fingerprint. These device log in features are facilitated through your device and not OMG and we have no control over such features, which you can change by accessing your device settings and preferences.

4. HOW WE USE YOUR INFORMATION

- 4.1. We may use your information for many purposes, such as to:
 - 4.1.1. Provide you with various products and services, including the Website and its contents, and payment processing.
 - 4.1.2. Fulfill the purpose for which you provide your information.
 - 4.1.3. Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
 - 4.1.4. Notify you of changes to any products or services we offer or provide through the Website.
 - 4.1.5. Improve our Website and to deliver a better and more personalized experience by enabling us to estimate our audience size and usage patterns, store information about your preferences, customize our Website according to your individual interests, speed up your searches, recognize you when you use the Website.
 - 4.1.6. Analyze trends and conduct research about improving our products and services.
 - 4.1.7. Provide customer service, including responding to questions from customers and Website users.
 - 4.1.8. Contact users for research, informational, and public health purposes and provide specific relevant information to you.
 - 4.1.9. Correlate information with other commercially available information to identify demographics and preferences to assist us in our efforts.
 - 4.1.10. Address information security and/or privacy issues, network functioning, and troubleshooting.
 - 4.1.11. Investigate claims and/or legal actions, violations of our policies and procedures, and compliance with relevant applicable laws and legal process.

- 4.1.12. Comply with applicable laws, regulations, or legal process as well as industry standards and our company policies.
- 4.1.13. Prevent, investigate, identify, or take any other action with regard to suspected or actual fraudulent or illegal activity, or any activity that violates our policies.
- 4.2. We will store your personal information for no longer than is necessary for the performance of our obligations or to achieve the purposes for which the information was collected, or as may be permitted under applicable law.

5. DISCLOSURE OF YOUR INFORMATION

5.1. We may disclose information:

- 5.1.1. To our subsidiaries and affiliates.
- 5.1.2. To contractors, service providers, and other vendors to help us operate our business and the Website, or administer activities on our behalf, such as Website maintenance, and payment processing.
- 5.1.3. To others, at your direction. For example, you may share your information with friends, family, other individuals, or other healthcare organizations. You may adjust your sharing preferences through the sharing features. Note that if you choose to provide access to your information to friends or family through the Website proxy access feature, they may obtain full access to all the information you have access to yourself on the Website. If you choose to provide access to any individual (e.g., nurse, social worker), those individuals may view a subsection of your information.
- 5.1.4. In the event we sell or transfer all or a portion of our business assets (e.g., further to a merger, reorganization, liquidation, or any other business transaction), including negotiations of such transactions.
- 5.1.5. In some cases, to other devices or applications as per your preferences. You have the ability to review which devices or apps have access to your information. Connecting to other devices or applications, may entail sharing information between the Website and such devices related to the device's technologies or features.
- 5.1.6. As permitted by law; (ii) where we determine that disclosure of specific information is necessary to comply with the request of a law enforcement or regulatory agency or other legal process; or (iii) to enforce our policies, or to protect legal rights, property, or safety.

- 5.2. From time to time we may enter into an arrangement with another company that is not owned by or affiliated with us to provide additional features on the Website. These arrangements may include business partners, sponsors, and co-branded online services (referred to here as "co-branded services"). Any information, including personal information, that you provide on one of these co-branded services may be shared with these partners. By participating in activities or providing your information on these co-branded services, you consent to our providing your information to those partners. Separate privacy policies may apply to these partners' uses of your personal information.

6. EXTERNAL LINKS AND FEATURES

The Website may contain links to, or features facilitated by, other online services. We are not responsible for the privacy practices, advertising, products, or content of online services that OMG does not control.

Please note that other online services have their own privacy policies and OMG is not responsible or liable for these policies.

7. YOUR CHOICES

- 7.1. If you have a registered account with the Website, you may log in and update certain preferences, account settings, or personal information details. You may also download and send records accessible through the Website or change sharing and device access preferences. You can also manage communications that you receive from us, including the method of communication (e.g., emails, phone calls, texts).
- 7.2. You may also use your device settings to change your geolocation and other Website permissions preferences. If you access your OMG MyChart account through a browser, information collected through the Website related to your Website account and settings may not be synchronized between the Website and the browser.

8. FOR CALIFORNIA RESIDENTS

California's "Shine the Light" law permits California residents to request certain information regarding our disclosure of personal information to third parties for their own direct marketing purposes. We do not share personal information with third parties for their direct marketing purposes. If you are a California resident, you may request information about our compliance with Shine the Light by contacting us at by e-mail at PrivacyOffice@omnicaremedgroup.com. Any such request must include "California Shine The Light Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code.

9. DATA SECURITY

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

10. CHANGES TO OUR PRIVACY POLICY

This Privacy Policy may change from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy. Your continued use of this Website after we revise this Privacy Policy means you accept those changes, so please check this Privacy Policy periodically for updates.

References & Citations

1. Health Insurance Portability and Accountability Act of 1996 ("HIPAA")
2. Health Information Technology for Economic and Clinical Health Act of 2009 ("HITECH")