

CCAW JV, LLC's
Website Privacy Policy

Last Revised: 11.19.21

1. General

We know that your privacy is important to you, and we work hard to earn and keep your trust. CCAW JV, LLC d/b/a The Clinic by Cleveland Clinic affiliates and related entities ("Company," "the Company," "we," "us," and "our,") respects your privacy and is committed to protecting your privacy through our compliance with this Privacy Policy (the "Policy"), and any related data, accounts, profiles, forms, and all other content provided therein for the purposes of providing educational virtual second opinion services through the Website (the "Services").

This Policy describes:

The types of information we collect from you or that you may provide when you visit our website available at:

- <https://globalvso.io/landing?instance=MyConsult> as well as any websites directly owned by the Company (collectively, our "Website").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on this Website or in emails and other electronic messages between you, other users of the Services and the Company, and information gathered when you interact with the Website and Services as disclosed in this Policy.

Please read this Policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use our Website or access the Services. By using our Website, you agree to the terms of this Policy. This Policy may change from time to time (see below, "Changes to this Policy"). Your continued use of our Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

2. Website Terms of Use; Other Agreements and Requirements

This Policy should be read in conjunction with any applicable Website Terms of Use, into which this Policy is incorporated by reference.

The laws that protect privacy and the confidentiality of individually identifiable health

information, such as the Health Insurance Portability and Accountability Act (“HIPAA”) may also apply to telemedicine and may apply to certain aspects of the Services. Should you engage the Services, you will receive and have the opportunity to review, and you must acknowledge the Company’s Notice of Privacy Practices (“NPP”) prior to participating in the Services. The NPP explains how the Company may use and disclose individually identifiable health information for treatment, payment, and healthcare operations.

However, please note that not all information you provide or use through engagement of the Website or Services is necessarily protected by HIPAA. Regardless, your Personal Information will always be processed in accordance with this Policy. Should there ever be a conflict between this Policy and the NPP with respect to any Personal Information, the NPP shall apply.

3. What We Collect and How We Collect It

To ensure that we provide you with the best possible experience, we will store, use, and share information about you in accordance with this Policy.

Information You Provide to Us

Personal information is any information that can be used to individually identify you from a larger group (“Personal Information”), such as data including, but not limited to, your:

- first and last name;
- email address;
- telephone number;
- mailing address;
- date of birth;
- gender;
- healthcare provider reviews;
- health insurance identification number or other health insurance information;
- member login credentials (i.e., usernames and passwords); and
- credit card and other financial account information.

You may provide us Personal Information when you:

- register yourself with the Website;
- schedule an appointment;
- confirm an appointment;
- review or comment on the Services; or
- communicate with us, such as to request information.

The information that you provide in each case will vary. In some cases, you may be able to provide Personal Information via email or free text boxes, such as when contacting the Company to request further information. When providing your Personal Information, please provide only relevant information and do not provide unnecessary

sensitive information, such as Social Security numbers, or other sensitive personal or financial data unless required for delivery of the Services.

Additionally, we may ask you to create a username and password that should only be known to you. When you provide this information to us, you are no longer anonymous. Moreover, we may receive information about you from other sources and add it to the information you have provided to us.

Automated Information Collection

In addition to the information that you provide to us, we may also collect information about you during your visit to our Website. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Website. Some of the tools we use to automatically collect information about you may include:

(a) Cookies. A “cookie” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use either (or both) of them:

(1) session cookies, which do not stay on your device after you close your browser, and

(2) persistent cookies, which remain on your device until you delete them or they expire.

We may use the following categories of cookies on our Website.

- i. **Strictly Necessary Cookies.** These cookies are essential in order to enable you to move around the Website and use its features. Without these cookies, services you have requested, such as maintaining a record of your purchased items (e.g. a shopping cart), cannot be provided.
- ii. **Performance Cookies.** These cookies collect anonymous information on how you use our Website to help us understand how you arrive at our Website, browse or use our Website and highlight areas where we can improve, such as navigation. The data stored by these cookies never shows personal details from which your individual identity can be established.
- iii. **Functionality Cookies.** These cookies remember choices you make such as the country from which you visit our Website, your preferred language, and your search parameters. This information can then be used to provide you with an experience more appropriate to your selections and to make your visits to our

Website more tailored to your preferences. The information in these cookies may be anonymized. These cookies cannot track your browsing activity on other websites.

- iv. **Targeting Cookies or Advertising Cookies.** These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third-party advertising networks.

Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser's settings. However, by disabling cookies on your device, you may be prohibited from full use of the Website's features or lose access to some functionality.

- (b) Google Analytics. The Website sends aggregated, non-Personal Information to Google Analytics for the purpose of providing us with the ability to conduct technical and statistical analysis on the Website's performance. For more information on how Google Analytics supports the Website and uses information sent from the Website, please review Google's privacy policy available at <https://policies.google.com/technologies/partner-sites>.
- (c) Web Beacons. A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of the third-party marketers we engage with may use Web Beacons to track your interaction with online advertising banners on our Website. This information is only collected in aggregate form and will not be linked to your Personal Information. Please note that any image file on a webpage can act as a Web Beacon.
- (d) Embedded Web Links. Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used by email recipients. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the Personal Information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.
- (e) Third-party Websites and Services. We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing

campaigns we are contracting them to provide. The information collected can be gathered on our Website and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third-party websites.

4. How We Use Your Information

The information we gather and that you provide is collected to provide you with relevant information and the Services you request, in addition to various other purposes, including, but not limited to:

- Provide, analyze, and improve the Services;
- Contact you;
- Send you information about additional clinical services or general wellness from us or on behalf of our affiliates;
- Conduct research using your information, which may be subject to your separate written authorization;
- Prevent potentially prohibited or illegal activities and otherwise in accordance with our Website Terms of Use; and
- For any other purposes disclosed to you at the time we collect your information pursuant to your consent, subject to any applicable limitation set forth under HIPAA and the HIPAA NPP.

5. How We Share Your Information

We do not sell or lease your Personal Information to any third party. We may disclose your Personal Information to our trusted third-party business partners in accordance with this Policy. We work with a number of partners that help us process your requests, deliver customer service and support, send email marketing communications, and provide high-quality experiences that you have come to expect from us. We will share your Personal Information with these third parties in order to allow them to fulfill the service that they provide to us. These third-party partners are under contract to keep your Personal Information secure and not to use it for any reason other than to fulfill the service we have requested from them.

Except as described in this Policy, we will not share your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- Responding to duly authorized information requests from law enforcement or other governmental authorities.
- Complying with any law, regulations, subpoena, or court order.
- Investigating and helping prevent security threats, fraud, or other malicious activity.
- Enforcing or protecting the rights and properties of the Company or its subsidiaries.

- Protecting the rights or personal safety of Company employees.

There are circumstances where the Company may decide to buy, sell, reorganize, or merge its business in selected countries. Under these circumstances, it may be necessary to share or receive Personal Information with prospective or actual partners or affiliates. In such circumstances, the Company will ensure your Personal Information is used in accordance with this Policy.

6. Your Choices and Selecting Your Privacy Preferences

We want to provide you with the relevant information that you have requested. When possible, we will always provide options as to what information we collect and how you can manage any preferences that pertain to such information.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or Service-oriented messages, such as appointment confirmation messages, are usually excluded from such preferences, as such messages are required to respond to your requests or to provide Services, and are not intended for the purposes of marketing.

We will not intentionally send you email newsletters and marketing emails unless you consent to receive such marketing information. After you request to receive these emails, you may opt out of them at any time by selecting the "unsubscribe" link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided.

7. Text Messaging

You may have the opportunity to receive SMS or "text" messages, pre-recorded voice messages or auto-dialed phone calls from the Company, its affiliates and related entities as well as third parties. Such messaging may be used to authenticate your identity or mobile device, as well as provide you informational updates about services or products you may have requested. In providing your mobile device number or cell phone number to the Company, you knowingly consent to such communications from the Company or for the Company to use your cell phone number or mobile device number in accordance with the Company's Website Terms of Use. In providing your number, you represent that you have the authority to agree to receive text messages at the telephone number that you provide to the Company, or from which you sent the text message request to us. You further acknowledge that no purchase is required to opt into this service, and you may opt out of receiving such texts at any time by following the instructions from CCAW. Therefore care should always be taken to limit the

Personal Information included in such messages, especially protected health information.

Any such communications you receive from us will be administered in accordance with your preferences and this Policy.

8. Accuracy and Access to Your Personal Information

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

Where we can provide you access to your Personal Information in our possession, we will always ask you for a username and password to help protect your privacy and security. We recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

To view and change the Personal Information that you have provided to us, you can log in to your account and follow the instructions on that webpage, or contact us directly for assistance.

9. Information of Minors

We do not knowingly allow individuals under the age of eighteen (18) to create accounts that allow access to our Services. We do not target the Website to minors, and would not expect them to be engaging with our Website or Services. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any Personal Information that we have collected about minors, we will take steps to securely remove it from our systems.

10. Third-party Websites

This Policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. Our Website may link to third-party websites and services. For example, if you click on an advertisement on this Website, you may be taken to another website that we do not own or control. These links are not endorsements of these websites, and this Policy does not extend to them. Because this Policy is not enforced on these third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or website and providing any information.

11. For Users in the United States

This Policy and Website are intended for Users based outside of the United States (“International Website Users”) only. If you are **NOT** an International Website User, please access our domestic [Website](#) and Privacy Policy.

12. Data Controller Contact Information

Under the (i) General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or “GDPR”), (ii) Data Protection Act 2018, (iii) the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland (i.e., “UK GDPR”) as provided in the Data Protection Act 2018, and (iv) any other applicable data protection legislation of any country or other jurisdiction (collectively “International Data Protection Laws”) individuals have specific rights with respect to their Personal Information, or “personal data” as defined under the International Data Protection Laws. For the purposes of this Policy, the Company operates as a data controller. Any personal data we collect from you is processed in the United States and under the terms of this Policy.

Any personal data we collect from you is processed in the legitimate interest of our business and providing our services to you as the lawful means of such processing. You may always withdraw your consent to our use of your personal data as described below. We will only retain your personal data for the time necessary to provide you the information and services to which you have consented, to comply with the law and in accordance with your rights below.

The Data Controllers are:

NAME: CCAW JV, LLC d/b/a The Clinic by Cleveland Clinic

ADDRESS: 10000 Cedar Avenue, Cleveland, OH 44106

EMAIL ADDRESS: vso@theclinic.io

13. International Website User/Visitor Rights

As an international user, you can exercise any of the following rights, subject to verification of your identity, by notifying us as described below:

- Access. You may email us at vso@theclinic.io to request a copy of the personal data our Website databases currently contain.
- Automated Processing and Decision-Making. You may email us at vso@theclinic.io to request that we stop using your personal data for automated processing, such as profiling. In your email, please explain how you wish us to restrict automated processing of your personal data. When such restrictions are

not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.

- Correction or Rectification. You can correct what personal data our Website database currently contains by accessing your account directly, or by emailing us at vso@theclinic.io to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause information to be incorrect. Where applicable, we will ensure such changes are shared with trusted third parties.
- Restrict Processing. When applicable, you may restrict the processing of your personal data by submitting a request via email to vso@theclinic.io. In your email, please explain how you wish us to restrict processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- Object to Processing. When applicable, you have the right to object to the processing of your personal data by submitting a request via email to vso@theclinic.io. When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- Portability. Upon request and when possible, we can provide you with copies of your personal data. You may submit a request via email to vso@theclinic.io. When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent. Where applicable, we will ensure such changes are shared with any trusted third parties.
- Withdraw Consent. At any time, you may withdraw your consent to our processing of your personal data through this Website by notifying us via email at vso@theclinic.io. Using the same email address associated with your Website account, simply type the words "WITHDRAW CONSENT" in the subject line of your email. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- Erasure. If you should wish to cease use of our Website and have your personal data deleted from our Website, then you may submit a request by emailing us at vso@theclinic.io. Upon receipt of such a request for erasure, we will confirm

receipt and will confirm once your personal data has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties. Submit Complaints or Questions. If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. You may also lodge a complaint in accordance with applicable Data Protection Laws. For example, if you reside in a European Union member state, you may lodge a complaint with the supervisory authority in your country. If you reside in the United Kingdom you may lodge a complaint with the United Kingdom's Information Commissioner's Office (UK ICO).

14. Countries to Which Your Personal Data May be Sent.

There may be instances where it may be necessary for us to transfer your information outside the European Union, United Kingdom, or other country where your data is collected (e.g., to our headquarters and various subsidiaries, or if we use third-party service providers from another country). In these circumstances, we will put in place suitable safeguards, for example an intra-group data transfer agreement or standard contractual clauses to ensure that your information is processed securely and in accordance with this Policy and applicable regulations. If you require further information about the safeguards we put in place, you can request such information by contacting us by email at vso@theclinic.io.

15. Safeguarding the Information We Collect

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information, including PHI, against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information through the proper use and security of any online credentials used to access your Personal Information, such as a username and password. If you believe your credentials have been compromised, please change your password. Please also notify us immediately of any actual or suspected unauthorized use.

16. Changes to this Policy

This Policy describes our current policies and practices with regard to the information we collect through this Website. We are continually improving and adding to the features and functionality of this Website along with the Services we offer. If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the "Last Revised" block above. You can get to this page from any of our webpages by clicking on the "Privacy Policy" link (usually at the bottom of the screen).

17. How to Contact Us

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please email vso@theclinic.io.

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**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.

At Cleveland Clinic, we believe your health information is personal. We keep records of the care and services that you receive at our facilities. We are committed to keeping your health information private, and we are required by law to respect your confidentiality.

This Notice describes the privacy practices of Cleveland Clinic and its affiliated facilities (Cleveland Clinic). This Notice applies to all of the health information that identifies you and the care you receive at Cleveland Clinic facilities.

Your health information may consist of paper, digital or electronic records but could also include photographs, videos and other electronic transmissions or recordings that are created during your care and treatment.

Federal and state laws require Cleveland Clinic to protect your health information and federal law requires us to describe to you how we handle that information. When federal and state privacy laws are different and conflict, and the state law is more protective of your information or provides you with greater access to your information, then we will follow state law. For example, where we have identified specific state law requirement in this notice, the referenced Cleveland Clinic location will follow the more protective state law requirements.

CLEVELAND CLINIC HEALTH SYSTEM AND AFFILIATED FACILITIES

All of our hospitals, employed physicians, doctor offices, entities, foundations, facilities, home care programs, other services, and affiliated facilities in the United States follow the terms of this Notice. Cleveland Clinic locations and facilities include but are not limited to the following:

- Cleveland Clinic Akron General
- Cleveland Clinic Union Hospital
- Florida: Cleveland Clinic Martin Health, Cleveland Clinic Florida [Weston], Cleveland Clinic Indian River Hospital, and associated ambulatory centers.
- Nevada: Cleveland Clinic Lou Ruvo Center for Brain Health in Las Vegas, NV
- Cleveland Clinic Canada

A complete list of Cleveland Clinic hospitals and locations are listed on our websites, <https://my.clevelandclinic.org/locations>, <https://my.clevelandclinic.org/about/website/privacy-practices>, or may be obtained by calling the Cleveland Clinic Compliance Office at 216.444.1709 (toll-free 800.223.2273, ext. 41709).

The doctors and other caregivers at Cleveland Clinic who are not employed by Cleveland Clinic exchange information about you as a patient with Cleveland Clinic employees. In connection with the health care that these health care practitioners provide to you outside of Cleveland Clinic, they may also give you their own privacy notices that describe their office practices.

All of these hospitals, doctors, entities, foundations, facilities, and services may share your health information with each other for reasons of treatment, payment, and health care operations as described below.

HOW CLEVELAND CLINIC MAY USE AND DISCLOSE YOUR HEALTH INFORMATION

When you become a patient of Cleveland Clinic, we will use your health information within Cleveland Clinic and disclose your health information outside Cleveland Clinic for the reasons described in this Notice. The following categories describe some of the ways that we will use and disclose your health information.

Treatment. We use your health information to provide you with health care services. We may disclose your health information to doctors, nurses, technicians, medical or nursing students, or other persons at Cleveland Clinic who need the information to take care of you. For example, a doctor treating you for a broken leg may need to ask another doctor if you have diabetes because diabetes may slow the leg's healing process. This may involve talking to doctors and others not employed by us. We also may disclose your health information to people outside Cleveland Clinic who may be involved in your health care, such as treating doctors, home care providers, pharmacies, drug or medical device experts, and family members.

Payment. We may use and disclose your health information so that the health care you receive can be billed and paid for by you, your insurance company, or another third party. For example, we may give information about surgery you had here to your health plan so it will pay us or reimburse you for the surgery. We may also tell your health plan about a treatment you are going to receive so we can get prior payment approval or learn if your plan will pay for the treatment.

Health Care Operations. We may use your health information and disclose it outside Cleveland Clinic for our health care operations. These uses and disclosures help us operate Cleveland Clinic to maintain and improve patient care. For example, we may use your health information to review the care you received and to evaluate the performance of our staff in caring for you. We also may combine health information about many patients to identify new services to offer, what services are not needed, and whether certain therapies are effective. We may also disclose information to doctors, nurses, technicians, medical students, and other persons at Cleveland Clinic for learning and quality improvement purposes. We may remove information that identifies you so people outside Cleveland Clinic can study your health data without knowing who you are.

Contacting You. We may use and disclose health information to reach you about appointments and other matters. We may contact you by mail, telephone or email. For example, we may leave voice messages at the telephone number you provide us with, and we may respond to your email address.

Health Information Exchanges. We may participate in certain health information exchanges whereby we may disclose your health information, as permitted by law, to other health care providers or entities for treatment. A full list of these arrangements can be found on our website, <https://my.clevelandclinic.org/about/website/privacy-practices> or may be obtained by calling the Cleveland Clinic Compliance Office at 216.444.1709 (toll-free 800.223.2273, ext. 41709).

Organized Health Care Arrangements. We may participate in joint arrangements with other health care providers or health care entities whereby we may use or disclose your health information, as permitted by law, to participate in joint activities involving treatment, review of health care decisions, quality assessment or improvement activities, or payment activities. A full list of these arrangements can be found on our website, <https://my.clevelandclinic.org/about/website/privacy-practices> or may be obtained by calling the Cleveland Clinic Compliance Office at 216.444.1709 (toll-free 800.223.2273, ext. 41709).

Health-Related Services. We may use and disclose health information about you to send you mailings about health-related products and services available at Cleveland Clinic.

Philanthropic Support. We may use or disclose certain health information about you to contact you in an effort to raise funds to support Cleveland Clinic and its operations. You have a right to choose not to receive these communications and we will tell you how to cancel them.

Patient Information Directories. Our hospitals include limited information about you in their patient directories, such as your name and possibly your location in the hospital and your general condition (for example: good, fair, serious, critical, or undetermined). We usually give this information to people who ask for you by name. We also may include your religious affiliation in the directories and give this limited information to clergy from the community. We do not release this information if you are being treated on a substance abuse unit. Releasing directory information about you enables your family and others (such as friends, community-based clergy, and delivery persons) to visit you in the hospital and generally know how you are doing. If you prefer that this personal information be kept confidential, you may make that request to the hospital admitting department and we will not release any of this information.

Medical Research. We perform medical research here. Our clinical researchers may look at your health records as part of your current care, or to prepare or perform research. They may share your health information with other Cleveland Clinic researchers. All patient research conducted at Cleveland Clinic goes through a special process required by law that reviews protections for patients involved in research, including privacy. We will not use your health information or disclose it outside Cleveland Clinic for research reasons without either getting your prior written approval or determining that your privacy is protected.

Organ and Tissue Donation. We may release health information about organ, tissue, and eye donors and transplant recipients to organizations that manage organ, tissue, and eye donation and transplantation.

Public Health and Safety. We will disclose health information about you outside Cleveland Clinic when required to do so by federal, state, or local law, or by the court process. We may disclose health information about you for public health and safety reasons, like reporting births, deaths, child abuse or

neglect, reactions to medications or problems with medical products. We may release health information to help control the spread of disease or to notify a person whose health or safety may be threatened. We may disclose health information to a health oversight agency for activities authorized by law, such as for audits, investigations, inspections, and licensure. We also may disclose health information about you in the event of an emergency or for disaster relief purposes.

AUTHORIZATIONS FOR OTHER USES AND DISCLOSURES

As described above, we will use your health information and disclose it outside Cleveland Clinic for treatment, payment, health care operations, and when required or permitted by law. We will not use or disclose your health information for other reasons without your written authorization. For example, most uses and disclosures of psychotherapy notes, uses and disclosures of health information for certain marketing purposes, and disclosures that constitute a sale of health information require your written authorization. These kinds of uses and disclosures of your health information will be made only with your written authorization. You may revoke the authorization in writing at any time, but we cannot take back any uses or disclosures of your health information already made with your authorization.

Ohio, Florida, and Nevada laws, as well as federal law, may require that we obtain your consent for certain disclosures of health information about the following: the performance or results of an HIV test or diagnoses of AIDS or an AIDS-related condition, genetic test results, drug or alcohol treatment that you have received as part of a drug or alcohol treatment program. Florida law also requires your consent for certain disclosures of behavioral health records.

YOUR RIGHTS REGARDING HEALTH INFORMATION

Right to Accounting. You may request an accounting, which is a listing of the entities or persons (other than yourself) to whom Cleveland Clinic has disclosed your health information without your written authorization. The accounting would not include disclosures for treatment, payment, health care operations, and certain other disclosures exempted by law. Your request for an accounting of disclosures must be in writing, signed, and dated. It must identify the time period of the disclosures and the Cleveland Clinic facility that maintains the records about which you are requesting the accounting. We will not list disclosures made earlier than six (6) years before your request. Your request should indicate the form in which you want the list (for example, on paper or electronically). You must submit your written request to the medical records department of the Cleveland Clinic hospital or facility that maintains the records:

Ohio, Nevada, Weston and Canada:

Mail should be addressed to the HIM Department, Cleveland Clinic Foundation, 9500 Euclid Ave., Cleveland, Ohio 44195.

Florida:

Cleveland Clinic Indian River Hospital: Assistance may be obtained by contacting the HIM Manager 772-567-4311, ext. 1104. Mail should be addressed to the HIM Department, 1000 36th Street, Vero Beach, FL 32960.

Cleveland Clinic Martin Health: Assistance may be obtained by contacting HIM 772-223-5945, ext. 13070. The HIM Department is located at the Cleveland Clinic Martin North Hospital, 200 S.E. Hospital Avenue, Stuart, FL. Mail should be addressed to: Director of Health Information Management, Cleveland Clinic Martin Health, P.O. Box 9010, Stuart, FL 34995.

We will respond to you within 60 days. We will give you the first listing within any 12-month period free of charge, but we will charge you for all other accountings requested within the same 12 months.

Right to Amend. If you feel that health information we have about you is incorrect or incomplete, you have the right to ask us to amend your medical records. Your request for an amendment must be in writing, signed, and dated. It must specify the records you wish to amend, identify the Cleveland Clinic facility that maintains those records, and give the reason for your request. We may deny your request; if we do, we will tell you why and explain your options. Cleveland Clinic will respond to you within 60 days. You must address your request to the Health Information Management [HIM] department of the Cleveland Clinic hospital or facility that maintains the records you wish to amend:

Ohio, Nevada, Weston and Canada:

Mail should be addressed to the HIM Department, Cleveland Clinic Foundation, 9500 Euclid Ave., Cleveland, Ohio 44195.

Florida:

Cleveland Clinic Indian River Hospital: Assistance may be obtained by contacting the HIM Manager 772-567-4311, ext. 1104. Mail should be addressed to the HIM Department, 1000 36th Street, Vero Beach, FL 32960.

Cleveland Clinic Martin Health: Assistance may be obtained by contacting HIM 772-223-5945, ext. 13070. The HIM Department is located at the Cleveland Clinic Martin North Hospital, 200 S.E. Hospital Avenue, Stuart, FL. Mail should be addressed to: Director of Health Information Management, Cleveland Clinic Martin Health, P.O. Box 9010, Stuart, FL 34995.

Right to Inspect and Obtain Copy. You have the right to inspect and obtain a copy of your completed health records unless your doctor believes that disclosure of that information to you could harm you. You may not see or get a copy of information gathered for a legal proceeding or certain research records while the research is ongoing. Your request to inspect or obtain a copy of the records must be submitted in writing, signed and dated, to the HIM department of the Cleveland Clinic hospital or facility that maintains the records. We may charge a fee for processing your request. If Cleveland Clinic denies your request to inspect or obtain a copy of the records, you may appeal the denial in writing to the Cleveland Clinic Compliance Office at the following address: Compliance Office DD2, The Cleveland Clinic Foundation, 9500 Euclid Ave., Cleveland, Ohio 44195.

Ohio, Nevada, Weston and Canada:

Mail should be addressed to the HIM Department, Cleveland Clinic Foundation, 9500 Euclid Ave., Cleveland, Ohio 44195.

Florida:

Cleveland Clinic Indian River Hospital: Assistance may be obtained by contacting the HIM Manager 772-567-4311, ext. 1104. Mail should be addressed to the HIM Department, 1000 36th Street, Vero Beach, FL 32960.

Cleveland Clinic Martin Health: Assistance may be obtained by contacting HIM 772-223-5945, ext. 13070. The HIM Department is located at the Cleveland Clinic Martin North Hospital, 200 S.E. Hospital Avenue, Stuart, FL. Mail should be addressed to: Director of Health Information Management, Cleveland Clinic Martin Health, P.O. Box 9010, Stuart, FL 34995.

Right to Request Restrictions. You have the right to ask us to restrict the uses or disclosures we make of your health information for treatment, payment, or health care operations, but we do not have to agree in most circumstances. However, if you pay out of pocket and in full for a health care item or service, and you ask us to restrict the disclosures to a health plan of your health information relating solely to that item or service, we will agree to the extent that the disclosure to the health plan is for the purpose of carrying out payment or health care operations and the disclosure is not required by law. You also may ask us to limit the health information that we use or disclose about you to someone who is involved in your care or the payment for your care, such as a family member or friend. Again, we do not have to agree.

A request for a restriction must be signed and dated, and you must identify the Cleveland Clinic hospital or facility that maintains the information. The request should also describe the information you want restricted, say whether you want to limit the use or the disclosure of the information or both, and tell us who should not receive the restricted information. You must submit your request in writing to the HIM department of the Cleveland Clinic hospital or facility that maintains the information you want restricted. We will tell you if we agree with your request or not. If we do agree, we will comply with your request unless the information is needed to provide you with emergency treatment.

Ohio, Nevada, Weston and Canada:

Mail should be addressed to the HIM Department, Cleveland Clinic Foundation, 9500 Euclid Ave., Cleveland, Ohio 44195.

Florida:

Cleveland Clinic Indian River Hospital: Assistance may be obtained by contacting the HIM Manager 772-567-4311, ext. 1104. Mail should be addressed to the HIM Department, 1000 36th Street, Vero Beach, FL 32960.

Cleveland Clinic Martin Health: Assistance may be obtained by contacting HIM 772-223-5945, ext. 13070. The HIM Department is located at the Cleveland Clinic Martin North Hospital, 200 S.E. Hospital Avenue, Stuart, FL. Mail should be addressed to: Director of Health Information Management, Cleveland Clinic Martin Health, P.O. Box 9010, Stuart, FL 34995.

Right to Request Confidential Communications. You have the right to request that we communicate with you about your health in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. Your request for confidential communications must be in writing, signed, and dated. It must identify the Cleveland Clinic hospital or facility making the confidential communications and specify how or where you wish to be contacted. You need not tell us the reason for your request, and we will not ask. You must send your written request to the HIM department of the Cleveland Clinic hospital or facility making the confidential communications. We will accommodate all reasonable requests.

Ohio, Nevada, Weston and Canada:

Mail should be addressed to the HIM Department, Cleveland Clinic Foundation, 9500 Euclid Ave., Cleveland, Ohio 44195.

Florida:

Cleveland Clinic Indian River Hospital: Assistance may be obtained by contacting the HIM Manager 772-567-4311, ext. 1104. Mail should be addressed to the HIM Department, 1000 36th Street, Vero Beach, FL 32960.

Cleveland Clinic Martin Health: Assistance may be obtained by contacting HIM 772-223-5945, ext. 13070. The HIM Department is located at the Cleveland Clinic Martin North Hospital, 200 S.E. Hospital Avenue, Stuart, FL. Mail should be addressed to: Director of Health Information Management, Cleveland Clinic Martin Health, P.O. Box 9010, Stuart, FL 34995.

Right to a Paper Copy of This Notice. You have the right to a paper copy of this Notice. You may ask us to give you a copy of this Notice at any time. Even if you have agreed to receive this Notice electronically, you are still entitled to a paper copy. You may obtain a paper copy of this Notice at any of our facilities or by calling the Cleveland Clinic Compliance Office at 216.444.1709 (toll-free 800.223.2273, ext. 41709). You also can view this Notice at our website, <https://my.clevelandclinic.org/about/website/privacy-practices>.

COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint with the Cleveland Clinic Compliance Office or with the Secretary of the U.S. Department of Health and Human Services. To file a complaint with Cleveland Clinic, you must submit your complaint in writing to the Compliance Office DD2, The Cleveland Clinic Foundation, 9500 Euclid Ave., Cleveland, Ohio 44195. You will not be penalized for filing a complaint.

CHANGES TO THIS NOTICE

Cleveland Clinic may change this Notice at any time. Any change in the Notice could apply to health information we already have about you, as well as any information we receive in the future. We will post a copy of the current Notice at each of our facilities and on our website, <https://my.clevelandclinic.org/about/website/privacy-practices>.

QUESTIONS

If you have questions about this Notice, you may call the Cleveland Clinic Office at 216.444.1709 (toll-free 800.223.2273, ext. 41709). A current list of Cleveland Clinic facilities may be found on our websites at <https://my.clevelandclinic.org/about/website/privacy-practices>, <https://my.clevelandclinic.org/locations>, or may be obtained by calling the Cleveland Clinic Compliance Office at 216.444.1709 (toll-free 800.223.2273, ext. 41709).