

## **Policy & Procedure**

**Title:** AltaMed Health Services Website Privacy Policy

**Policy #:** HS-PRV-004

**Issuing Dept.:** Office of Compliance and Ethics

**Effective Date:** 08/01/2021

**Approved by:** Board of Directors

**Revision Date:** 12/30/2024

## **Contact Information**

For further information on this policy, contact the Privacy Office within the Office of Compliance and Ethics at [contact email].

## **1. INTRODUCTION**

This AltaMed Health Services Website Privacy Policy (“Privacy Policy”) explains how AltaMed Health Services (“AHS”, “we”, “us”, “our”) collects, uses, and protects personal information created, received, maintained or transmitted by or to the AltaMed Website (“Website”) when you access or use the Website. By accessing or using the Website, you agree to the practices described in this Privacy Policy.

This Privacy Policy explains our practices and governs the use of personal information AHS creates, receives, maintains or transmits from you or about you through the Website.

This Privacy Policy complies with applicable privacy regulations, including but not limited to the Health Insurance Portability and Accountability Act ("HIPAA") and the 2023 Final Rule governing reproductive health privacy, the Health Information Technology for Economic and Clinical Health Act ("HITECH"), the California Consumer Privacy Act ("CCPA") and its amendments under the California Privacy Rights Act ("CPRA"), and 42 CFR Part 2, which protects the confidentiality of substance use disorder (SUD) treatment records.

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 AHS. Moreover, any information created, received, maintained or transmitted by or through the Website may be considered protected health information, as governed by HIPAA, HITECH, and applicable state law. Please refer to our Notice of Privacy Practices for more information on how AHS uses and/or discloses protected health information.

If you do not agree with our policies and practices, please do not use the Website.

## **Policy**

### **1. CHILDREN’S PERSONAL INFORMATION**

The Website is intended for a general audience and not directed at children under the age of 17. We do not knowingly collect personal information from children under 17. Minors cannot create a Website account at this time. As a non-profit organization, AHS’s collection of children’s personal information is not governed by the U.S. Children’s Privacy Protection Act (“COPPA”). If we learn that we have collected information from a child under this age threshold without appropriate consent, we will promptly delete it.

### **2. INFORMATION WE COLLECT**

#### **2.1. Information You Provide**

2.1.1. We, and our service providers, may collect personal information that you provide when you complete forms, fill out surveys, schedule appointments, request prescription refills, send messages to your care team, or make payments through the Website.

2.1.2. Personal information directly provided by you that we, and our vendors, may collect include:

- Your name, contact details (email, phone, address), and account credentials.
- Demographic information, including gender identity, sexual orientation, marital status, race, ethnicity, religion, and language preferences.
- Health-related data, including insurance details and insurance coverage information (such as insurance card photos, claims, and referrals), prescription history, and health conditions.
- Payment and financial information for processing transactions.
- Emergency contact and caregiver information.
- Scheduling preferences.
- Social assistance-related information.
- Photographs
- Pharmacy information.
- Any other information you submit through forms, surveys, or messages sent via the Website.

2.1.3. If you provide personal information about another person, you represent that you have obtained their authorization to so.

## **2.2. Information We Collect Automatically**

2.2.1. We, or our service providers may use cookies, beacons, or similar tracking technologies to automatically collect certain information whenever you interact with the Website such as:

- Usage data, such as page visits, traffic data, and interactions.
- Device data, including IP address, browser type, internet connection, operating system, and mobile network information.
- Location data based on device settings and permissions.
- Crash analytics, and/or other communication data

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.

## **2.3. Sensitive Information**

2.3.1. We may collect sensitive personal information, such as health data or biometric identifiers, as required to provide services. Such data is handled in compliance with HIPAA and other applicable laws.

## **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 AHS 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 use the information collected for purposes including:
  - 4.1.1. Providing Website functionality, products, services, and payment processing.
  - 4.1.2. Fulfilling the purpose for which you provide your information.
  - 4.1.3. Personalizing your user experience and content delivery.
  - 4.1.4. Complying with legal obligations, including HIPAA and CCPA requirements.
  - 4.1.5. Investigating potential fraudulent or malicious activity.
  - 4.1.6. Improving our services through data analytics and research.
  - 4.1.7. Carrying out our obligations and enforcing our rights arising from any contracts entered into between you and us, including for billing and collection.
  - 4.1.8. Notifying you of changes to any products or services we offer or provide through the Website.
  - 4.1.9. Improving 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.
  - 4.1.10. Analyzing trends and conducting research about improving our products and services.
  - 4.1.11. Providing customer service, including responding to questions from customers and Website users.
  - 4.1.12. Contacting users for research, informational, and public health purposes and providing specific relevant information to you.
  - 4.1.13. Correlating information with other commercially available information to identify demographics and preferences to assist us in our efforts.
  - 4.1.14. Addressing information security and/or privacy issues, network functioning, and troubleshooting.
  - 4.1.15. Investigating claims and/or legal actions, violations of our policies and procedures, and compliance with relevant applicable laws and legal process.
  - 4.1.16. Complying with industry standards and our company policies.
  - 4.1.17. Preventing, investigating, identifying, or taking any other action with regard to suspected or actual fraudulent or illegal activity, or any activity that violates our policies.
- 4.2. We process your data based on legal grounds, such as your consent, legitimate interest, contractual necessity, or compliance with legal obligations.

- 4.3. In compliance with the HIPAA Final Rule, reproductive health data, including data related to contraceptive services, abortion care, or fertility treatments, is protected under enhanced privacy measures.
- 4.4. In compliance with 42 CFR Part 2, SUD treatment information is only disclosed with your explicit written consent, unless required by law or in medical emergencies, in accordance with federal regulations.
- 4.5. 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 share your information:

5.1.1. With contractors, service providers or other vendors for operational purposes or to administer activities on our behalf (e.g., hosting, payment processing).

5.1.2. With affiliates and subsidiaries to enhance service offerings.

5.1.3. In the event we sell or transfer all or a portion of our business assets (e.g., further to a merger, acquisition, reorganization, liquidation, or any other business transaction), including negotiations of such transactions, subject to applicable confidentiality requirements.

5.1.4. To others, at your direction. For example, we 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.

5.1.5. 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; 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 to enforce our policies, or to protect legal rights, property, or safety.

5.1.7. We may share sensitive health information (e.g., SUD treatment or reproductive health data) only under the following circumstances:

- Explicit written consent from you or your authorized representative.
- As permitted under 42 CFR Part 2, including in response to specific legal or regulatory obligations.
- To health care providers in emergencies, ensuring the safety and well-being of individuals involved.

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 cobranded 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.

5.3. We do not sell your personal information to third parties.

## **6. EXTERNAL LINKS AND FEATURES**

6.1. 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 AHS does not control.

6.2. Please note that other online services have their own privacy policies and AHS 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 AltaMed MyChart account through a browser (at [myaltamed.net](https://myaltamed.net)), information collected through the Website related to your Website account and settings may not be synchronized between the Website and the browser.

## **8. YOUR RIGHTS**

Depending on your location, you may have the following rights:

### **8.1. California Residents (CCPA/CPRA)**

8.1.1. Right to know the categories and specific pieces of personal information collected.

8.1.2. Right to request deletion of personal data, subject to exceptions.

8.1.3. Right to opt out of the sharing of personal data.

8.1.4. Right to correct inaccurate information.

8.1.5. Right to limit the use of sensitive personal data.

To exercise these rights, contact us at [altamedPrivacyOffice@altamed.org](mailto:altamedPrivacyOffice@altamed.org). Verification of your identity may be required.

### **8.2. California's "Shine the Light" law**

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 [altamedPrivacyOffice@altamed.org](mailto:altamedPrivacyOffice@altamed.org). 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.

**8.3.** You have additional rights related to sensitive health information, including the right to restrict the sharing of reproductive health or SUD treatment information beyond what is required for service delivery or legal compliance, and the right to request an accounting of disclosures specific to these sensitive data categories.

## **9. DATA SECURITY**

We implement measures such as encryption, access controls, and regular audits designed to protect your information from accidental loss and from unauthorized access, use, alteration, and disclosure. However, no transmission or storage system is completely secure. 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. COOKIES AND TRACKING TECHNOLOGIES**

We use cookies and similar technologies to enhance your experience. You can manage cookie preferences through your browser settings or opt out of certain tracking technologies through tools provided by organizations such as the Network Advertising Initiative.

#### **11. UPDATES TO THIS PRIVACY POLICY**

We may update this Privacy Policy periodically. Significant changes will be communicated through the Website or other direct communication channels. 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.

#### **12. CONTACT US**

If you have any questions about this Privacy Policy, please contact:

Ofer Barlev, Esq., CHC, CHPC, CIPP/US  
Privacy Officer  
AltaMed Health Services  
[altamedPrivacyOffice@altamed.org](mailto:altamedPrivacyOffice@altamed.org)  
(323) 282-2303 ext. 2403

#### **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”)
3. California Consumer Privacy Act (“CCPA”)
4. California Privacy Rights Act (“CPRA”)