

www.handshealehr.com Privacy Policy

Handshealehr.com (“**HHEHR**,” “**we**,” or “**us**”) is committed to protecting the personal health-care information of its users, so it’s important that you read the Privacy Policy, which explains how HHEHR collects and uses the information it collects and stores. HHEHR provides an electronic health-care records database to be used by health-care providers (“**Providers**”), the Provider’s authorized personnel (“**Authorized Personnel**”), and their patients (“**Client**”). So it’s important to understand that the information in those records is accessible and viewable by Clients, Providers, and Authorized Personnel.

This Privacy Policy applies to and governs each user’s access to and use of our website located at www.handshealehr.com (the “**Site**”), including Providers, Authorized Personnel, and Patients (referred to collectively as “**you**,” “**your**,” or “**user**”). This Privacy Policy also applies to any information collected, stored or used by us by other means—for example, if you email us or provide us information over the phone. This Privacy Policy, together with our [Terms of Use](#) (“**Terms**”), is a legally binding agreement between you and us (the “**User Agreement**”). We may, from time to time, unilaterally modify the User Agreement, including this Privacy Policy, without notice to you, so it is important that you review this Privacy Policy and the User Agreement every time you use this Site.

By accessing or using the Site, registering an account with us, and/or using HHEHR’s services (the “**Services**”), you agree with, and intend to be bound by, the terms of this Privacy Policy, including regarding the collection, processing, storage, transfer and use of your Personal Information (as defined below). Please do not access or use the Site if you do not agree to the terms of this Privacy Policy.

1. **Information We Store & Information We Collect.**

(a) Information We Store:

- i. Personal Information. For the purposes of this Privacy Policy, we define “**Personal Information**” as personal and health-related information, including, without limitation, names, addresses, insurance plan information, contact information, medical and social history, current medical needs, and any other information that by itself or in connection with other information is capable of identifying a natural human person, like you.
 1. We store Personal Information provided to us by Clients, Providers, and/or Authorized Personnel. Please be aware that all information you provide on the Site or for the Services may be accessed and viewed by your Provider and your Provider’s Authorized Personnel.
 2. It is your choice to provide your Provider and your Provider’s Authorized Personnel with information. If you do not wish for us to store certain information or for your Provider or Authorized

Personnel to have access to certain information, **do not enter it into your account**, submit it to the Site, or otherwise provide it to us.

3. Neither the Site nor the Services are directed at children under the age of 13, but a parent or legal guardian of a minor child may, in compliance with the Terms, use the Services on behalf of his or her minor child. Any information that the parent provides us while using the Services on behalf of the minor child will be treated as Personal Information as otherwise provided herein.
- ii. Information from Providers. Providers using the Site or Services, and their Authorized Personnel should be particularly aware of their obligations of patient confidentiality, including without limitation their obligations under the Health Insurance Portability and Accountability Act (“HIPAA”). HHEHR does not have, and will not accept, any obligations of confidentiality with respect to any communications other than those expressly stated in this Privacy Policy, HHEHR’s Terms, and a Provider’s Subscriber Agreement or Business Associate Agreement, if any.
 - iii. Record Retention and Transfer. Personal Information stored by HHEHR is associated with a Provider and/or Authorized Personnel who has a subscriber agreement with HHEHR. After that subscriber’s agreement with HHEHR is terminated, HHEHR retains a copy of the Personal Information associated with a subscriber’s account for sixty (60) days. You understand, consent, and agree that (1) upon termination of the applicable subscriber agreement, HHEHR may provide the Provider or Authorized Personnel a digital copy of the Personal Information stored in your account; (2) HHEHR may transfer your Personal Information at the direction of your Provider or Authorized Personnel; and (3) after sixty (60) days from the date of termination of the applicable subscriber agreement, HHEHR may destroy all associated Personnel Information. Notwithstanding anything to the contrary in this Agreement and without limitation, you agree to release and hold HHEHR harmless, including its affiliates and each of its directors, officers, employees, and agents from any suits, claims, damages, demands, proceedings, and other actions, and all associated expenses (including but not limited to reasonable attorney fees, assessments, fines, losses, penalties, and/or costs of investigation and response) arising out of or relating to such transfer or destruction of Personal Information.

(b) Information We Collect:

- i. As explained above, HHEHR stores Personal Information, but it does not collect or have access to Personal Information stored in its electronic health-care records. HHEHR does, however, collect information you provide, such as your name or email address, to respond inquiries, set up and maintain

Provider accounts, or send you general information. HHEHR does not use your contact information for any other purpose or share it with third-parties.

- ii. The Site uses passive tracking technologies to log anonymous, non-identifiable information such as your device IP address, browser type, operating system, screen resolution and Site usage (for example what pages are accessed, how often they are accessed, referring/exit pages and URLs). We may also employ “cookies” or similar technologies that collect similar types of anonymous information. We will never attempt to connect this automatically collected information with your Personal Information and we will never “follow” you and collect information about you once you leave the Site.
- iii. You can always set your browser’s privacy settings to reject cookies, which will prevent those cookies from collecting the information described above. However, certain features of the Site or Services may not be available to you or may not function correctly if you do not accept cookies.

2. Privacy and Protection of Children and Legal Minors. We take protection of the privacy of legal minors very, very seriously. In order to adhere to the Children’s Online Privacy Protection Act (“COPPA”), neither the Site nor the Services are directed at children. HHEHR will not knowingly collect any Personal Information directly from individuals under 13, but Providers, Authorized Personnel, and parents of minor children may submit Personal Information on behalf of minor children in accordance with the Terms. If we learn that we have collected Personal Information directly from an individual under 13 without parental consent we will remove such Personal Information from the Site and our systems.

3. How We Use Information and When We Disclose It.

- (a) Use. We will use (including collect and store) Personal Information, and other information we collect in accordance with this Privacy Policy as necessary to:
 - i. Provide the features, products or services you have requested on the Site and responding to your requests and emails;
 - ii. Improve the quality and design of the Site and to create new features and services by storing, tracking, and analyzing user preferences and trends; and
 - iii. Comply with applicable law, including document retention or record-keeping laws and as necessary for us to maintain our records in the normal course of business. This may include electronic or paper records, including the creation and maintenance of archival copies of electronic data or back-up media or servers.

- (b) Disclosure of Personal Information. We may disclose your Personal Information and any other information we collect:
- i. To third-party companies or individuals providing services to us or acting on our behalf, such as companies providing technological or fulfillment services, financial institutions and similar entities, all only to the extent necessary to operate the Site and provide you with the Services and features you request. All such third-parties are required by us to adhere to our Privacy Policy or to similarly restrictive privacy or confidentiality obligations;
 - ii. When required to do so by law, for example, in response to a court order or a subpoena;
 - iii. To law enforcement agencies or other public agencies (including schools or children services) in response to their request(s) or if we believe that such disclosure may prevent the instigation of a crime;
 - iv. As we deem necessary to protect the Site, our users (including you), our property and our personnel, including as necessary to meet or enforce the terms of HHEHR's agreements, including those with Providers and the User Agreement; and
 - v. To a prospective purchaser of HHEHR acquiring all or most of the assets relating to HHEHR, to the extent permitted by law.
- (c) Other Disclosures of Personal Information to Third-Parties. We will never sell, transfer or otherwise disclose your Personal Information to any third-parties unless you authorize us to do so. If we intend to collect and disclose Personal Information for other purposes, including if certain features of the Site or Services require such disclosure of your Personal Information, we will notify you first.
- (d) Disclosure of Non-Personal Information or Anonymous/Aggregated Information. We may disclose to third parties certain aggregate information contained in your user account or other aggregated, anonymous information (such as that collected automatically) as we deem appropriate, including for research purposes, improving the Site or Services, or adding or modifying features.

4. **Opting Out.** We give you control over how much Personal Information you provide to us and how we are permitted to use it. The simplest way to exercise this control is to not provide us (or your Provider or Authorized Personnel) with Personal Information you do not want to be collected, stored and/or used as set forth in this Privacy Policy. However, subject to our ability to retain certain Personal Information and our ability to disclose Personal Information, each as described above, you can also control certain aspects of how we use your Personal Information. If you would like to opt out of certain permitted uses,

please contact us at privacy@handshealehr.com. Please be aware that opting out of some permitted uses may limit the Services HHEHR can provide to you or your provider.

5. **Do Not Track Technology.** HHEHR will obey Do Not Track signals as required by law.
6. **Links and Third Party Sites.** From time to time we may provide advertisements for third-party goods or services or links on the Site to third-party websites. These third-party goods, services, and websites (including any cookies placed on our Site by such third-parties) are not covered by this Privacy Policy. Please remember that the third-party sites, including their cookies, are operated by companies that are outside of our control, and your activities at those sites will be governed by the policies and practices of those third parties. We encourage you to review the privacy practices of these third-parties before disclosing any Personal Information, as we are not responsible for the privacy practices of those sites. Any interactions, correspondence, or business dealings that you have with any advertisers and other third parties found on or through the Site or Services (including via linked websites) are solely between you and the third-party (including, without limitation, issues related to the content of third party advertisements, payments, delivery of goods or services, warranties, and the like). HHEHR disclaims all liability in connection with such third-party goods, services, and websites.
7. **Security.** We use reasonable technological and procedural measures to protect the Personal Information you provide. We take protection of your Personal Information seriously; however, we cannot guarantee the safety or privacy of your Personal Information. You acknowledge, agree and understand that communication via the Internet, and security measures in connection with such communication, are not failsafe or foolproof, and there is always a possibility that data, including Personal Information, may be lost or intercepted by unauthorized parties during such transmission or after receipt. You agree that HHEHR has no liability whatsoever in connection with such lost or intercepted data. To learn more about how to protect yourself online, we encourage you to visit the website www.onguardonline.gov.
8. **Transfer of Personal Information Across Jurisdictional Boundaries.** We may transfer Personal Information and store it outside of the United States or the jurisdiction in which you are located, which may result in the provision of less protection than might be provided in your home jurisdiction. As indicated in our Terms, this Privacy Policy is governed and construed in accordance with applicable United States and State of Washington laws.
9. **Disclaimers, Liability and Indemnity.** Please be sure to review the [Terms of Use](#) which contain important information about, among other things, our disclaimer of liability for damage arising out of your use of the Site and Services (including in connection with this Privacy Policy), your assumption of risk and indemnity obligations in connection with the User Agreement.
10. **Changes to Privacy Policy.** We may change the Site, the Services, the Terms, or this Privacy Policy at any time and in our sole discretion. We will post the updated version on the Site and we will notify you by other means if we think the changes will significantly

impact the treatment of Personal Information you have already provided. Your continued access to or use of the Site and Services constitutes acceptance of any modifications of the Privacy Policy. Our use of information gathered or obtained at any time is subject to the Privacy Policy in effect at the time of such use. If you have any questions or concerns after reading this, please email us at: privacy@handshealehr.com

Hands Heal EHR LLC