

# Privacy Policy

Updated as of December 23, 2019

Your privacy is important to us. We are committed to the care and improvement of human life, and that includes protecting Personal Information (defined below). We are dedicated to maintaining information confidentiality and complying with regulatory requirements by – among other things – limiting access to only those users that have a legitimate need to view it, and regularly educating employees on information protection.

This privacy policy (“Privacy Policy”) covers our online privacy practices with respect to use and/or disclosure of information we may collect from you when you access or use our this website (“Website”), Portals (as defined below), and any other websites or applications we may provide that link to this Privacy Policy (collectively, our “Services”). The Services are provided by the Website owner identified on the Website homepage (“we,” “us,” or “our”). This Privacy Policy does not apply to information collected through other means, such as by telephone or in person. Please review our privacy practices and contact us at [privacy@hcahealthcare.com](mailto:privacy@hcahealthcare.com) if you have questions.

## Information Collected through the Website

Our Website may include pages that give you the opportunity to provide us with Personal Information about yourself. As used in this Privacy Policy, "Personal Information" means any information that may be used, either alone or in combination with other information, to personally identify an individual.

We collect certain information, including Personal Information, from and about our Website users in three ways:

- directly from you
- directly from our web server logs
- with cookies

## Information Provided by You

We and our service providers collect Personal Information through online forms in order to provide certain features of the Services to you. For example, if applying for a job through the Website, we may request you to fill out a form with information such as your name, e-mail address, phone number, and work experience. If you

do not provide the information required to submit the forms, we may not be able to provide you with related features and services.

In some cases, you may have the opportunity to enter into our secure forms any content that you choose. You are responsible for such content.

## Web Server Logs

When you access or use our Services, we may track information to administer our Services and analyze its usage. Examples of information we may track include:

- Your Internet protocol address
- The kind of browser or computer you use
- Number of links you click within our Services
- State or country from which you accessed our Services
- Date and time of your visit
- Name of your Internet service provider
- Third party websites you linked to from our Services
- Pages or information you viewed on our Services

We use this information to analyze trends, administer and improve our Services, and monitor traffic and usage patterns for information security purposes and to help make our Services more useful.

## Cookies and Web Beacons

A “cookie” is a small text file that may be transferred to your computer's hard drive in order to personalize our services for you and to collect aggregate information regarding usage of our Services by all of our users. Each computer is assigned a different cookie that contains a random, unique number. Our Services uses two different types of cookies: a “session” cookie, which is required to track a user session, for example, and which expires shortly after the session ends), and a “persistent” cookie, used to track unique visits to the Portal (defined below), as well as how the user arrived at the Portal (for example, through an email link or from a referral link), and the type of user (patient, provider, etc.). So that users are not counted twice, this cookie can “persist” anywhere from six months to two years.

Your browser software can be set to warn you of cookies or reject all cookies. Most browsers offer instructions on how to reset the browser to reject cookies in the “Help” section of the toolbar. If you reject our cookie, this may disable some of the functionality of our Services and you may not be able to use certain services.

Cookies cannot be used to run programs or deliver viruses to your computer. One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page, or navigate within a website, a cookie helps the website to recall your specific information on subsequent visits. This simplifies the process of delivering relevant content and eases website navigation by providing and saving your preferences and login information as well as providing personalized functionality.

We use Google Analytics on our Site to help us analyze the traffic on our Site. For more information on Google Analytics' processing of Personal Information, please see <http://www.google.com/policies/privacy/partners/>." By using a [browser plugin](#) provided by Google, you can opt out of Google Analytics.

Some of features on our Services (such as social media widgets that allow you to share content) may use cookies or other methods to gather information regarding your use of the Services, and may combine the information in these cookies with any of Personal Information about you that they may have. The use of such information by a third party depends on the privacy policy of that third party.

A "web beacon," "clear GIF," "web bug," or "pixel tag" is a tiny graphic file with a unique identifier that is similar in function to a cookie, but would allow us to count the number of users that have visited certain pages or screens of our websites, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, web beacons can tell the sender whether and when the email has been opened. In contrast to cookies, which may be stored on your computer's hard drive, web beacons are typically embedded invisibly on pages or screens.

We reserve the right to share aggregated site statistics monitored by cookies and web beacons with our affiliates and partner companies. We treat the information of everyone who comes to our Services in accordance with this Privacy Policy, whatever their Do Not Track setting.

## Geolocation Data

We do not collect precise information (e.g., GPS data; latitude and longitude) concerning the location from which you access the Services, but we collect information on your region or postal code to help us gather information useful for improving the relevance of our content and securing our Services.

## Third Party Advertising

We may allow third party advertising companies to serve ads when you access or use our Services. These companies use non-personally identifiable information regarding your access and use of our Services and other websites, such as the user IP address, pages viewed, date and time of your visit, and number of times you have viewed an ad (but not your name, address, or other personal information), to serve ads to you on our Services

and other websites that may be of interest to you. In the course of serving advertisements to our Services, our third party advertiser may place or recognize a unique cookie on your browser. In addition, we may use clear GIFs or pixel tags to help manage our online advertising. These clear GIFs enable our ad serving company to recognize a browser's cookie when a browser visits our Services. This allows us to learn which banner ads bring users to our Services.

## Information Collected through the Portal

As a service to its customers, we may also provide Portals to offer some customers secure, private access to their own records at our facilities, as well as certain internet-based services which may include, among other things, assistance in finding a doctor, assistance in scheduling appointments, the ability to register for classes and pre-register for procedures, the ability to make payment for medical services rendered, and access to health and patient education materials and secure messaging (“Portal”).

The Portal can provide you with access to some of your medical records. When you seek access to those records on the Portal, we need to confirm it is you so we ask you for information such as your name and email or physical address and other information such as your date of birth (which we may also use to make sure you are eligible to use the Portal in accordance with the Terms) and the answers to “secret questions” to which only you know the answers. This information may be used to help administer your user account and in managing your account. We may need to ask you for the information again when you sign in from a new device.

We may ask for information about your location and medical needs to assist with finding a physician, and may collect and pass on information (which may include, where relevant, health information such as your patient history) to assist you in scheduling appointments, pre-registering for procedures, and registering for classes.

## The Purposes for Which We Use Personal Information

If you submit or we collect Personal Information through our Services, then such Personal Information may be used in the following ways: (i) to provide, analyze, administer, and improve our Services; (ii) to contact you in connection with our Services and appointments, events or offerings that you may have registered for; (iii) to identify and authenticate your access to the parts of our Portal or other password-protected Services that you are authorized to access; (iv) to send you surveys; (v) for recruiting and human resources administration purposes; (vi) to protect our rights or our property and to ensure the technical functionality and security of our Services; and (vii) as required to meet our legal and regulatory obligations.

If you are a visitor from the European Economic Area, our legal basis for collecting and using the information described in this Privacy Policy will depend on the information concerned and the context in which we collect it. We collect information from you:

- where we need it to perform our contract with you (i.e., our Terms);
- where the processing is in our legitimate interests (provided that these aren't overridden by your interests or rights)(such as securing and improving our Services, for example);
- where the processing is for the provision of healthcare or the management of healthcare services (e.g., health information collected from you or made accessible to you through the Portal in accordance with legal requirements governing the confidentiality of such information); or
- if we otherwise have your consent.

If you have questions about or need further information concerning the legal basis on which we collect and use your information, please contact us using the contact details provided under the “Contact Us” section below.

## How We Disclose Personal Information

We do not sell, lease, rent or otherwise disclose the Personal Information collected from our Site to third parties unless otherwise stated below or with your consent.

- **Our Third Party Providers.** We transfer Personal Information to third party service providers to perform tasks on our behalf and to assist us in providing our Services. For example, we may use third party service providers for security, website analytics, and payment processing. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Information, and require our service providers to maintain confidentiality and comply with applicable laws in the processing of Personal Information. A list of our [current third party service providers is available here](#).
- **In the Event of Merger, Sale, or Change of Control.** We may transfer or assign Personal Information to a third party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control.
- **Other Disclosures.** We may disclose Personal Information about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our terms of use, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to our or third parties' rights, property or safety.

In addition to the uses and disclosures of information outlined above, if you use the Portal, your information may also be used and disclosed as follows:

- **Authorized Representatives.** If another individual is managing your account on your behalf (for example, a mother managing the account of her son), as authorized by you or as a personal representative under applicable law, that person can view all Personal Information about you in the Portal.
- **Healthcare Providers.** Your healthcare providers may have access to Personal Information for administrative and healthcare services. We may also use Personal Information to respond to and fulfill your orders and requests.
- **Partners.** We may share Personal Information with marketing, treatment or health care operations support partners, who are also required to protect the confidentiality of your information, that will enable them to send you targeted messages or serve you targeted advertising, which will occur with your authorization or otherwise in compliance with HIPAA (defined below) and other applicable laws.

## Information Security

No website can guarantee security, but we maintain appropriate physical, electronic, and procedural safeguards to protect your personal information collected via our Services in compliance with applicable law. Please see the Terms of Use available via the Website homepage (“Terms”) for more specific information about information security and your responsibilities.

## What Can I Do to Protect My Privacy?

Where you use a Portal or other service that is secured with a username and password, you are also responsible for taking steps to protect the privacy of Personal Information about you. In order to protect your privacy, you should:

- Never share your username or password.
- Always sign out when you are finished using the Portal.
- Use only secure web browsers.
- Employ common anti-virus and anti-malware tools on your system to keep it safe.
- Use a strong password with a combination of letters and numbers.
- Change your password often.
- Notify us immediately if you feel your login and/or password have been compromised at [privacy@hcahealthcare.com](mailto:privacy@hcahealthcare.com).

Please note that if you share your Portal username and password with another person, this will allow that person to see your confidential medical record information. We have no responsibility concerning any breach of your confidential medical record information due to your sharing or losing your user name or password.

## Retention of Information

We will retain Personal Information for the period necessary to fulfill the purposes for which it has been collected as described in this Privacy Policy unless a longer retention period is required by law (e.g., laws mandating retention of medical records for a certain period of time).

Where practical, we dispose of certain categories of information, including Personal Information, on a regular schedule. For example, we dispose of web server logs after 90 days, information submitted through secure forms after 6 months, access and activity logs relating to the Portal after 1 year, and information collected for analytics purposes on the Website (e.g., information on pages visited on the Website) after 2 years.

## Third Party Websites and Payments

If you use the Portal to link to another third party website, you may decide to disclose personal information at that website. Please be aware that in contacting that third party website, or in providing information on that website, that third party may obtain personal information about you. This Privacy Policy does not apply when you leave the Portal and go to a third party website from the Portal. We encourage you to be aware when you leave the Portal and to read the privacy statements of each and every website that collects personally identifiable information.

Any payments you may make for services you have found on the Portal (such as enrolling in a class) are made exclusively through an affiliated third party website the separate privacy policy of which applies, and not through the Portal. We are not responsible for any fees, charges, or actions provided by such a third party website.

## User Communications

- Email communications that you send to us via the email links on our Services may be shared with a customer service representative, employee, medical expert or agent that is most able to address your inquiry. We make every effort to respond in a timely fashion once communications are received. Once we have responded to your communication, it is discarded or archived, depending on the nature of the inquiry.
- The email functionality on our Services does not provide a completely secure and confidential means of communication. It is possible that your email communication may be accessed or viewed by another Internet user while in transit to us. If you wish to keep your communication private, do not use our email.

## Your Rights

### Personal Information

If you are a Portal user, you may access and amend personal demographic information when logged into the Portal. If you would like to access, amend, erase, export, or object to or restrict the processing other Personal Information collected via our Services, you may submit a request to [privacy@hcahealthcare.com](mailto:privacy@hcahealthcare.com) or write to us at:

One Park Plaza  
Nashville, TN 37203

We will promptly review all such requests in accordance with applicable laws.

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Information about you. We encourage you to first reach out to us at [privacy@hcahealthcare.com](mailto:privacy@hcahealthcare.com) so we have an opportunity to address your concerns directly before you do so.

## Communications Opt-Out

We may send certain messages, including electronic newsletters, notification of account statuses, and marketing communications on a periodic basis. If you wish to be removed from such messages, you may request to discontinue future ones. All such material will have information as to how to opt-out of receiving it, although certain messages (such as a secure message sent by a doctor or an account status update via the Portal), may be required and will not have opt-out capabilities.

## Your California Privacy Rights

Under California Law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of personal information, such as name, e-mail and mailing address and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes; and (b) the names and addresses of all such third parties. To request the above information, please contact us at [privacy@hcahealthcare.com](mailto:privacy@hcahealthcare.com) with a reference to California Disclosure Information.

We will endeavor to respond to such requests to information access within 30 days following receipt at the e-mail address stated above. If we receive your request at a different e-mail address, we will respond within a reasonable period of time, but not to exceed 150 days from the date received. Please note that we are only required to respond to each customer once per calendar year.



## California Consumer Privacy Act of 2018 (“CCPA”)

This section only applies to California residents (“Consumers”). For the purposes of this section only, “Personal Information” means information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household.

Consumers have the following rights:

- **Right to Request Information.** You have the right to request that we disclose the following information to you, limited to the preceding twelve (12) months:
  - The categories of Personal Information that we collected about you.
  - The categories of sources from which the Personal Information is collected.
  - The business or commercial purpose for collecting or selling Personal Information.
  - The categories of third parties with whom we share Personal Information.
  - The specific pieces of Personal Information that we have collected about you.
  - The categories of Personal Information that we disclosed about you for a business purpose.
  - The categories of Personal Information that we sold about you and the categories of third parties to whom the Personal Information was sold, by category or categories of Personal Information for each category of third parties to whom the Personal Information was sold.

Please note that we are only required to respond to such requests from you twice in a twelve-month period.

- **Right of Deletion.** You have the right to request that we delete any Personal Information about you which we have collected from you.

**Right to Opt-Out.** You have the right to direct us not to sell your Personal Information. You may exercise your opt-out rights by clicking on the following link: [Personal Information Request](#) or by calling us at **844-422-3282**.

- **Right to Opt-In.** If you are at least 13 years of age and less than 16 years of age you have the right to opt-in to the sale of your Personal Information. If you are a Consumer who is less than 13 years of age, then your parent or guardian has the right to opt-in to the sale your Personal Information.
- **Non-Discrimination.** We may not discriminate against you because you exercise any of your rights under the CCPA, including, but not limited to:
  - Denying goods or services to you.
  - Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
  - Providing a different level or quality of goods or services to you.
  - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

- **Limited Rights of Job Applicants, Employees, Medical Staff Members, and Contractors.** If you are a job applicant, employee, medical staff member, or contractor, to the extent that we collect information from you in your role as such, you have the right, at or before the point of collection, to know the categories of Personal Information that we will collect or have collected and the purposes for which we will use the categories of Personal Information.

You may submit requests for information by calling us at **844-422-3282** or by emailing us at [Personal Information Request](#).

The categories of sources from which we collect Personal Information are:

- directly from you
- directly from our web server logs
- with cookies and web beacons.

The categories of third parties with whom we share Personal Information are described in detail in the “[How We Disclose Personal Information](#)” section of this Privacy Policy.

The chart below describes:

- The categories of Personal Information that we have collected about Consumers in the preceding twelve (12) months and may collect about you through our Website, Portal, and Services.
- The categories of Personal Information that we have disclosed about Consumers for a business purpose in the preceding twelve (12) months.
- The categories of Personal Information that we have sold about Consumers in the preceding twelve (12) months.

Category	Examples	Disclosed for a Business Purpose	Sold
<b>Identifiers</b>	Name, address, e-mail address, telephone number, date of birth, IP address	Yes	No
<b>Personal Information categories described in Cal. Civ. Code § 1798.80(e)</b>	Name, address, telephone number, insurance policy number, employment history, medical information, health insurance information	Yes	No
<b>Protected classification characteristics under California or federal law</b>	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic	Yes	No

	information (including familial genetic information)		
<b>Commercial information</b>	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Yes	No
<b>Internet or other similar network activity</b>	Internet protocol address, type of browser, number of links clicked within our Services, state or country from which you accessed our Services, date and time of visit, name of Internet service provider, third party websites you linked to from our Services, pages or information you viewed on our Services, number of times you have viewed an ad	Yes	No
<b>Geolocation data</b>	Region or postal code	Yes	No
<b>Professional or employment-related information</b>	Work experience, performance evaluations	Yes	No

The purposes for which the categories of Personal Information shall be used, and the business or commercial purposes for collecting or selling personal information, are described in detail in the following sections of this Privacy Policy: (i) Web Server Logs, (ii) Cookies and Web Beacons, (iii) Geolocation Data, (iv) Third Party Advertising, (v) Information Collected through the Portal, (vi) The Purposes for Which We Use Personal Information, (vii) How We Disclose Personal Information, and (viii) User Communications.

### Your Nevada Privacy Rights

We may collect the following categories of covered information about you through our Website, Portals, and Services when you visit the Website and Portals or use the Services such as:

- First and Last Name
- Physical Address
- Email Address
- Telephone Number
- User Name

We may share such covered information with categories of third parties such as Marketing.

Third parties may collect covered information about your online activities over time and across different Internet websites or online services when you use the Website, Portals, or Services.

If you use or visit the Website and Portals or use the Services you may review and request changes to any of your covered information that is collected through the Website, Portals, or Services by calling [844-422-3282](tel:844-422-3282).

You may submit a verified request that we not sell any covered information that we have collected or will collect about you by calling [844-422-3282](tel:844-422-3282). After we receive your request and determine that it is a verified request, we will not sell any covered information that we have collected or will collect about you.

## What if I am accessing this Portal from outside of the United States?

If you are visiting our Portal from outside the United States, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. Although the data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, please be assured that we take steps to protect your privacy, including, for transfers of Personal Information from the European Economic Area, the use of contractual clauses (known as “Model Clauses” or “Standard Contractual Clauses”) that have been approved by the European Commission. By using our Portal, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

## HIPAA Policies

If you are one of our patients, your personal information in our possession is protected health information (“PHI”) protected by the Health Insurance Portability and Accountability Act of 1996, as amended (“HIPAA”), and the applicable provisions of the Health Information Technology for Economic and Clinical Health (HITECH) Act. In addition to this Privacy Policy, the HIPAA Notices of Privacy Practices of those Provider facilities apply to your PHI.

In collecting Personal Information, our Services may also collect PHI. Just as we strive to protect Personal Information we are committed to protecting your PHI. If there is a breach of your PHI, we are required by law to notify you. Your PHI will remain confidential, and will only be disclosed to you or your personal representative, unless otherwise required by state or federal law. In all circumstances, unless otherwise required by law, we will obtain your written authorization before using or disclosing your PHI. This protection extends to PHI that is oral, written, or electronic.

## Connecticut Privacy Policy Notice

If collected, we will take reasonable measures to protect the confidentiality of Social Security numbers and limit access to those with a need for such information. We prohibit the unlawful disclosure of Social Security numbers.

## Children's Privacy

We will never ask for or knowingly collect Personal Information from children through the Services or Portal. If you are a child, you are not permitted to use the Portal and should immediately exit our Portal or get an adult. Parents of un-emancipated minors may set up accounts for themselves to access their children's medical records only as permitted pursuant to the Terms governing the Portal. If you think that we have collected personal information from a child through this Portal, please contact us at [privacy@hcahealthcare.com](mailto:privacy@hcahealthcare.com) and we will dispose of the information as required by applicable law.

## Policy Changes

We reserve the right to change the terms of this Privacy Policy at any time by posting those changes in revisions to this Privacy Policy, so that you are always aware of our processes related to collection, use and disclosure of information. We urge you to check here for any updates to this Privacy Policy from time to time. Unless otherwise indicated, any changes to this Privacy Policy will apply immediately upon posting to the Website.

## What if I have questions or concerns regarding this Privacy Policy?

If you have any questions or concerns about this Privacy Policy or the information practices of our Services, please contact us at [privacy@hcahealthcare.com](mailto:privacy@hcahealthcare.com).

You may also contact us at:

HCA Healthcare  
Data Protection Officer  
One Park Plaza  
Nashville, TN 37203