



## HENDRICKS REGIONAL HEALTH ONLINE PRIVACY POLICY

### **Welcome**

Thank you for your interest in Hendricks Regional Health (“HRH”) websites and mobile applications.

HRH administers a number of websites including [hendricks.org](http://hendricks.org), [mychart.hendricks.org](http://mychart.hendricks.org), [hub.hendricks.org](http://hub.hendricks.org), and certain mobile applications (each a “Site”).

HRH Sites are generally subject to this Privacy Policy and our Terms of Use. Protected health information (“PHI”) subject to privacy regulations under the federal Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) is also subject to HRH’s HIPAA Notice of Privacy Practices (“NPP”). Certain other Sites (or pages on Sites) may be subject to additional or different privacy policies, because of the nature of the Site or the data collected through the Site. For example, HRH MyChart is subject to a different privacy policy.

As you browse the Sites, you may also be able to access websites that are operated by third parties via web links that are not part of HRH. HRH is not responsible for such pages, and neither this Privacy Policy nor any other HRH policy apply to websites or mobile applications that are run by third parties. Be sure to review all policies and terms of use that apply on any third party website or mobile application you access to become familiar with its privacy practices.

### **About this Policy**

The purpose of this Privacy Policy is to tell you how HRH collects, uses, shares, and protects your individually identifiable personal information (“personal information”) collected through a Site.

We will update this Privacy Policy from time to time, and update the Effective Date accordingly. If you use a Site, you are agreeing to the applicable privacy policies and terms of use. Do not use a Site if you do not agree with this Privacy Policy and any other privacy policies or terms of use that apply to that Site.

This Privacy Policy does not apply to information that has had identifiers removed or other actions taken so that you are no longer identified in the data (“de-identified data”). For example, identifiers such as your name, date of birth, or other data elements may be removed from certain data sets. HRH may use and share with third parties any de-identified data for any purposes permitted by applicable law, such as for HRH or third party operations, research, development or provision of services or products.

## **Questions? Contact Us**

If you have any questions about this Privacy Policy, a Site, or your information, you may contact [assistance@hendricks.org](mailto:assistance@hendricks.org) or call us at 317-745-4451. You may also contact us at 1000 E. Main Street, Danville, Indiana 46122. Because e-mail is often not secure, please use caution in sending sensitive information by e-mail.

## **PRIVACY PRINCIPLES**

### **Location Based Approach to Privacy Practices**

HRH determines the basis for use and processing of data based on the location of HRH's operations related to the Site.

HRH provides services in the State of Indiana located in the United States. Our Sites are based in, and are directed at individuals located in, the United States of America. If you are located outside of the United States, be aware that information we collect will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may not be as protective as those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, law enforcement, or other third parties in the United States according to laws of the United States.

Certain laws protect categories of individuals, like minors or residents of certain states, or types of information, like health information, and we comply with those laws when determined to apply to a HRH Site.

For example:

- HRH may collect and process data for purposes of fulfilling a contract or providing a service you have requested, for purposes of operating the HRH Site, or as permitted or required by law.
- Certain HRH Sites may collect HIPAA-protected health information ("PHI"). Information about how HRH uses and discloses PHI is described in the HRH NPP. The HRH MyChart patient portal is subject to a different privacy policy, located at <https://www.epic.com/about/privacypolicies#mobile-policy-patient> and the NPP. If you have questions or concerns about uses and disclosures of PHI, such as that collected through HRH MyChart, please contact us at (317) 456-9060.
- Certain HRH Sites may collect information protected by specific laws, such the Family Educational Rights and Privacy Act ("FERPA"), and may be subject to additional protections, as described in the privacy policy that applies to the specific Sites that process that type of data.
- HRH is not subject to the Children's Online Privacy Protection Act ("COPPA") and does not intend to collect online personal information subject to COPPA from minors under the age of 13 without parental consent. If you believe that we have collected

information from such a minor without parental consent, please contact [assistance@hendricks.org](mailto:assistance@hendricks.org) so that we may address this.

We use and disclose information as permitted by law. If we no longer have a legal basis to use or disclose the information, we will no longer use or disclose the identifiable information. For example, in some cases, consent is required for us to process your information; if you ask to revoke consent to use or disclose the information and we grant the revocation, we will exert reasonable efforts to stop using your identifiable information unless continued use is necessary. Continued use is necessary if the information has been integrated into a database; if it has been de-identified and is no longer identifiable as relating to you; if removal would adversely affect the integrity or accuracy of data used by HRH, or if we are required to maintain or use it for legal reasons or otherwise cannot honor the request. For example:

- Under some circumstances, you may unsubscribe from certain marketing communications, and once we have processed the request, we will exert reasonable efforts to stop using your contact information to send marketing information to you.
- Many internet browsers have "Do Not Track" features which, when turned on, send a signal (the "DNT signal") to websites and applications that a user visits to indicate the user does not want to be tracked. Because there is not yet a common understanding of how to interpret DNT signals and there is no common definition of "tracking", we, like many other healthcare providers, are not currently able to respond to DNT signals. Therefore, turning on the DNT signal on your browser will not prevent you from being tracked on our Site. You can learn more about Do-Not-Track at <https://allaboutdnt.com/>.

### **Limited Purposes**

Information about how HRH may use data, including personal information, is contained in this Privacy Policy. More specific information about the use or disclosure of certain types of data by HRH may be contained in the NPP, any Site-specific privacy policy, and/or a disclosure at the time information is collected.

HRH uses information that it collects to provide services, educate and inform users of HRH Sites of health-related issues, for other compatible purposes, and to fulfill its mission, including training, research and general health education, e.g.,

- If you provide your email address so that you can receive e-mails about a particular activity, we may send information about other topics that we believe are compatible with your request.
- If you submit information into a form on a Site, the form may specify the intended uses of the information. HRH may use the information for related and permissible purposes, as described in this Privacy Policy, any Site-specific privacy policy, or our NPP, as applicable.
- We will use personal information to provide you with information, goods, or services or to process transactions that you have requested or agreed to receive. For example:

- For Sites that require registration, we will use your personal information to process your registration, including as necessary verification that your information is active and valid.
  - We will use personal information to manage and administer a Site, such as managing user accounts.
- We may use your information to create new service offerings, to personalize your experience on any of the Sites, or to suggest to you specific content that may be most relevant to you.
- We may use your information to contact you about your use of any of the Sites. HRH may update this this policy from time to time without prior notice to you. Users can determine if there have been changes in this Privacy Policy by checking the Effective Date.
- We have the right to use information to prevent unauthorized, improper or illegal activities on the Site.
- We will use information for our internal business purposes.
- We may share information with third parties performing services for us, such as a data analytics company that is helping us improve a Site. We may also share information with other third parties that help us provide information about HRH and the goods and services that we provide to the communities we serve.
  - We may collect information using tracking tools that use small snippets of code, often called “cookies” and “web beacons” or “pixels”. These tools help us to understand how to effectively connect users to the Sites and HRH goods and services, and to improve users’ browsing experience while on the Sites.
  - Some third parties may use cookies, web beacons, and other storage technologies to collect or receive information from HRH Sites and other sites on the internet and use that information to provide measurement services and target ads. If you have an account with that third party, they may be able to connect information regarding your visits to HRH Sites to other information for purposes of targeted marketing and other purposes. You may be able to opt out of such cookies and other technologies through your browser settings, e.g., Google Analytics with a Browser Add On, available at Google Analytics Opt-out Browser Add-on Download page.
  - You can manage the information collected and shared for data analytics and other purposes by changing how your browser handles cookies, or by clearing your device’s cache (storage of information about your computing activities) regularly. You can find how information is used and shared by reading the privacy policies and terms and conditions of all websites and other online services that you choose to use. If you choose to refuse, disable or delete these technologies, some of the functionality of website may not be available to you.
  - For information on managing how your browser handles cookies, you can visit <https://allaboutcookies.org/how-to-manage-cookies>.

- If you provide us your phone number, we may use it to communicate with you via phone call or text message, if that is consistent with the purposes for which you provided the phone number.

### **Data Minimization**

HRH seeks to only collect the information that is reasonably related to our permitted uses of your information. Information, including sensitive information such as health information, financial information or location information, may be collected from a variety of sources including Site users and third parties. Information uses may include the performance of services, product improvement, operation of the Sites and other operations, and other uses permitted by applicable laws and regulations. For example:

- See the above discussion regarding the use of “cookies”, “web beacons” and other tools for various business purposes.
- A Site may ask for your location to provide services to you, such as to help you locate a HRH hospital or clinic near your home. You may control geolocation through your browser setting. You provide permission for this functionality via a browser notice.
- A Site may ask you for your health condition to help you identify a physician, or to make an appointment at your request.

### **Protected Health Information**

HRH takes the privacy and security of your health information seriously. Where information collected by tracking and support technologies may intersect with Individually Identifiable Health Information as defined in 45 CFR 160.103, HRH’s NPP will govern the use and disclosure of the information by HRH and will also be subject to HRH’s own HIPAA policies and procedures.

### **Accuracy**

You must ensure that information you provide to HRH is accurate at the time you provide it. HRH seeks to maintain accurate information. If you advise us of an error affecting your personal data and request an update, we will evaluate the request. If we determine that the data that we hold is inaccurate, we will correct the information. However, if we determine that the information we hold is accurate and does not require updating; if updating the information is infeasible or inappropriate, (for example, if removal of data would corrupt a database); or if the request for changes to information would result in data inaccuracies, we will not make the requested change. We may also elect to retain and not update information if permitted or required by applicable law, or if necessary to fulfill the purposes for which data was collected.

### **Integrity and Confidentiality**

HRH uses reasonable and appropriate safeguards to retain your information for the amount of time we need to use it and to keep your information private and secure as appropriate for the type of information. We seek to protect information from improper use or disclosure to third parties. For example:

- HRH has policies and procedures and provides training to help prevent HRH workforce members from accessing personal information unless they need the information in order to do their jobs.
- HRH maintains certain physical and electronic safeguards against improper uses and disclosures of regulated personal information, like Social Security numbers, driver's license numbers, and credit card numbers.
- When HRH works with a third party, such as a data analytics company that requires HRH to disclose information to the third party, HRH seeks appropriate agreements with the third party requiring it to safeguard the information and limit use of the information to permitted purposes.

Please carefully consider the information you access and share through a Site, because no electronic information can be guaranteed to be 100% private or secure.

### **Additional Details Regarding How We Use Your Information**

#### **HRH Rights to Your Content**

As permitted by applicable law, except where we have otherwise explicitly agreed, you grant to HRH a non-exclusive, irrevocable, royalty-free, worldwide and perpetual license to use, publish, reproduce, or make derivative works of the content, including your name, voice, likeness and other personal information that is part of any user-generated content, such as words you submit through a Site or photos you publish on a Site, and we may use all or any portion of that content for advertising, marketing, publicity, promotion of HRH services, and other permissible activities without payment, remuneration or other obligation to you. You promise that any content you submit to the HRH Sites will not violate the rights of third parties, including but not limited to trademarks, copyrights, and rights of publicity or privacy, and will not violate any laws.

#### **Consent to Text Messaging, Phone Calls, and E-mails**

By providing a phone number and/or email address to HRH through a contact form or elsewhere on a Site, you authorize all HRH entities and providers and all of their affiliates, subsidiaries, employees, contractors, and agents to contact you, including using autodialed calls, texts, robot calls, and artificial voices or prerecorded voices, at the telephone numbers you provided with regard to information about services, billing, collections and other account activities, and for advertisement and telemarketing purposes. You are not required to provide this consent and this consent is not a condition to purchasing any property, goods, or services. If you do not provide this consent, please do not provide a phone number on any Site.

You understand that it is not possible to guarantee that any transfer of information over text messaging or e-mail is 100% timely, complete, accurate, private or secure. As a result, HRH cannot guarantee the timeliness, completeness, accuracy, privacy or security of your information when it is sent via a text message or e-mail. By asking HRH to transmit information to you through text messaging or e-mail, you accept all risks associated with the transmission.