

NOTICE of PRIVACY PRACTICES FOR THINK DATA INSIGHTS, LLC

Effective Date: August 31, 2018

HIPAA

This Notice of Privacy Practices may be required by Federal Law and describes how Personal Information about you may be used or shared by Think Data Insights, LLC in its work for a Covered Entity. It also tells you how to get an accounting of your Personal Information. Please review this notice carefully as it may change from time to time and any questions should be directed to our privacy officer Kayte Bittorie at Think Data Insights, LLC, 150 4th Avenue North, Floor 20, Nashville, TN 37219; kayte.bittorie@thinkdatainsights.com or contact our Fractional General Counsel and Compliance Attorney Julie-Karel Elkin at jkelkin@spicerfirm.com.

Incidental to our Work with a Covered Provider

1. The kinds of Personal Information we may have access to:

- Certain facts about you like your name, where you live, possible insurance information, and other biographical and historical information.

We may also have health facts like:

- A list of the health services and treatments you get.
- Notes or records from you doctor, pharmacy, hospital, or other health care providers.
- Lists of the medicine you take now or have taken before.
- Results from diagnostic and/or lab tests.

Your Personal and Health Information is Private.

State and Federal Laws allow us to access, compile and provide reporting on this type of information, but we must follow privacy rules and keep your Personal Information confidential. Everyone who works with us and for us must also follow these privacy rules.

2. How we may use or share your Personal Information:

The privacy rules let us use or share Personal Information without asking for your permission to:

- Help you get the health care and treatment you need from our clients.
- Facilitate the healthcare operations of our clients.
- Coordinate payment with health plans and other health care providers with our clients.

3. Who can we share your Personal Information with:

- With you. Upon written request and only if we still have access to it.
- Other people involved in your care, like family members or caregivers, upon written request and only if we still have access to it. You can also ask us not to share your Personal Information with certain people.
- And those who work with us:
 - Health providers like doctors, nurses, hospitals, and clinics that work with us.
 - A health plan or other companies that have assigned work to us.

- Federal, state, or local government agencies providing or checking on health care operations or reporting requirements.

As part of our work, we have agreed to keep your Personal Information private. If required to do so by law or one of our clients, we'll ask you to sign a paper giving us your OK if we need to use or share any of your Personal Information for other purposes not related to health care operations or reporting.

Generally, you can refuse us access to your personal information, but you must tell us in writing and we can't take back the Personal Information we have already accessed and compiled.

4. What if you don't want all of your Personal Information shared:

You must ask us and/or the Covered Entity in writing if you don't want us to access or share your Personal Information. You must tell us and/or the Covered Entity the Personal Information you don't want accessed or shared and who you don't want us to share it with.

There are other times when we won't share your Personal Information if you ask us. We'll say OK if we can, but we might not say OK if we're allowed to share the Personal Information by law pursuant to our work for our clients. If we can't say OK, we will let you why.

What if you don't ask us to not share your Personal Information? We may use and share it only as explained in this notice.

5. What are your rights?

- You can see and get copies of your records. You must ask in writing to do so. You may have to pay money for the cost of copying and mailing your copies. If we can't give you the Personal Information you want, we'll tell you why.
- You can ask us in writing not to share certain facts about your health.
- You can ask us to not show your Personal Information in certain records.
- You can ask us not to send you letters about fundraising.
- You can ask us to change Personal Information that's wrong. You must ask in writing and tell us why we need to change it. If we can't make the change, we'll tell you why.
- We don't believe we will need to contact you, but you can ask us in writing to contact you in a different way or in a different place, if necessary. If writing or talking to you puts you in danger, tell us.
- You can ask us in writing for a list of who we've shared your Personal Information with. The list will say who got your health facts for the six (6) years before the date of your request. But it won't list the times we've shared when you've given us your OK or other times when the law says we didn't need to get your permission. Like when we use Personal Information:
 - to help you get health care from a Covered Entity we are working with, or
 - to help with payment for your care with one of our clients, or
 - to help the Covered Entity run its business, or
 - to give to law enforcement if we're required by law to do so.

Who else can we share your Personal Information with? We will only do so as part of our agreement with our clients, but the privacy rules also say we can share Personal Information with people like:

- Coroners, funeral homes, or providers who work with services like organ transplants.
- Medical researchers. They must keep your Personal Information private.
- Public health agencies to update their records for births, deaths, or to track diseases.
- The court system when the law says we must or when we are ordered to.
- The police or for other legal reasons. We can report abuse or neglect.
- Other agencies – like for military or veterans’ activities, national security, jails.

Again, we do not anticipate doing so, unless it is part of our work with a client, we can also share your Personal Information if we take out the information that tells who you are. But, we can’t share your Personal Information with just anyone. And even when we do share it, we can only share the information the person needs to actually do their job.

You have a right to receive notice of a breach and we will provide notice by First Class Mail or email, if you have indicated that preference. We will notify you of the loss or theft of any unsecured protective health information as soon as possible, but no later than 60 days following its discovery. Unsecured protected health information is information that is not secured through the use of technology or methodology identified by the secretary of the U.S. Department of Health and Human Services to render the information unusable, unratable, and indecipherable to unauthorized users. We will provide notice of the following:

- The description of the breach;
- A description of the type of information involved;
- Steps you should take to protect yourself;
- Description of the actions we are taking;
- Contact information;
- And a way for you to communicate with us regarding the incident.

If the breach involves ten or more individuals whose contact information is out of date, we will post the notice on the homepage of our website and if it involves more than 500 individuals in any state or jurisdiction we will send notice to prominent media outlets as well. We may also notify the secretary of Health and Human Services as required and in the event a breach is less than 500 individuals during the year we will maintain a written log of breaches involving less than 500 individuals.

You have a right to receive a paper copy of this notice and even if you have previously been provided a copy, we will make additional copies available to you upon request. You may also obtain a copy of this notice at our website www.ThinkDataInsights.com. In order to make sure that you are able to exercise these rights, please contact the security and privacy officer **Kayte Bittorie at Think Data Insights, LLC, 150 4th Avenue North, Floor 20, Nashville, TN 37219; 615-431-3652; kayte.bittorie@thinkdatainsights.com** or our contact our Fractional General Counsel and Compliance Attorney **Julie-Karel Elkin at 615-425-7355; jkelkin@spicerfirm.com** if you have any questions or concerns.

To file a complaint with us, please contact either of the individuals listed above and note that all complaints must be submitted in writing, but you will not be penalized for filing any complaints.

We reserve the right to change this notice and the notice shall remain effective until a new notice is provided with a new effective date.

If you believe your rights have been violated or if you have a complaint regarding our privacy policy or the execution of it, please contact the Secretary of the Department of Health and Human Services at <http://www.hhs.gov/ocr/privacy/hipaa/compliance/index.html>.

The privacy of your Personal Information is important to us and we look forward to helping our clients utilize data to provide better service to you.