

Platform Privacy Policy (HIPPA)

Protecting your privacy on our platform

What this policy covers

This Platform Privacy Policy (**Policy**) pertains to the information about you that KAMs collects, receives, uses, and shares from desktop, mobile, or cloud-based software via our website and our HER system operational through TEBRA, formally known as KAREO. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

We may also provide different or additional privacy notices in connection with certain activities, programs, and offerings, including additional “just-in-time” notices that may supplement or clarify our privacy practices or provide you with additional choices regarding your personal information.

Personal information does not include publicly available information from government records, de-identified or aggregated consumer information, or information excluded from applicable laws, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (**HIPAA**). If you are a patient using our Platform, the information you provide to us through the Platform may be considered protected health information (**PHI**) and will be protected by KAMs via TEBRA as required by federal and state laws. TEBRA processes PHI on our behalf and it is governed by our agreements with them, including our Business Associate Agreement as required by HIPAA. As your information is shared based on your permission as directed by the “Patient Consent & Authorization for Release of Protected Health Information form.”

Information We Collect

The types of personal information we obtain about you depend on how you interact with us and our services. When we use the term “personal information,” it means information that identifies, relates to, describes, or can be associated with you. We may collect the following categories and specific types of personal information when you use our EHR Platform (Managed by TEBRA):

Basic Identifiers

When you create an account on our Platform, we collect basic identifying information from you, including your full name, email address, phone number, account name, signature, or other similar identifiers. We will only use that personal information for the purpose of completing your care.

Government-Issued Identifiers

You will be required to upload a government issued ID as a identifier for Medicare on. This is solely for identification verification purposes ONLY.

Payment Information

When you create an account, we will ask you to enter your credit card or ACH information.

Demographic Data

When you start care with us and interact with our EHR, when you sign up for the Platform, we will collect information related to your gender, race, and ethnicity, some of which may include characteristics of protected classifications under state or federal law.

User Content

When you interact with our HER on our behalf, Tebra collects information you provide, including emails, survey responses, comments, EHR product reviews, testimonials, and other content.

Internet or Other Network Activity

Kareo may automatically receive and record information on our server logs from your browser, including your internet protocol (IP) address, your browsing or search history, and information related to your interactions with our Platform, emails, or advertisements.

How We Collect Information

KAMs does not directly collect any information but TEBRA captures data

Directly from You when you interact with our EHR features

They collect personal information you provide to us, such as when you create an account, contact us, respond to a survey, or sign up to receive emails, text messages, and/or postal mailings.

Cookies and Other Tracking Technologies

Certain portions of the Platform use cookies to recognize your preferences and temporarily store session information on your browser. A cookie is a small

text file, which often includes an anonymous unique identifier, that is placed on your computer's hard drive by a webpage server. Cookies contain information that can later be read by a web server in the domain that issued the cookie. We do link the information we store in cookies to personal information you submit while on our Platform.

Behavioral Targeting/Re-Targeting

We do not display advertising on our website. If you do get an ad, you may also opt out of interest-based advertising through the settings on your device or within a mobile app, but your opt-out preferences may apply only to the browser or device you are using when you opt out.

How We Use Your Information

We use the information we collect through surveys for the following purposes:

- **Providing Services**, provide improved customer support, and communicate with you about our services.
- **Business Operations**, improve operational processes.
- **Core Functionality and Improvement**. We may use information we collect to provide core functionality on and to improve our Site, including for Site analytics.
- **Communicating With You**. We use your personal information to communicate with you.
- **Referrals**. If you choose to refer others to our services, we will ask for your name and business email address. We ask that you provide permission.
- **Legal Obligations**, we may provide access to your information, including personally identifiable information, when legally required to do so, including to comply with a court order, to cooperate with police investigations, or in connection with other legal proceedings

How We Share Your Information

In addition to the specific situations discussed elsewhere in this privacy policy, we disclose personal information in the following circumstances:

- **Legal Disclosures**. KAMs may be required to disclose personally identifiable information or PHI under special circumstances, such

as to investigate, prevent, or act regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service and related policies, or as otherwise required by law.

- **Service Providers.** On our behalf Tebra perform services to support our core business functions and internal operations, including providing customer service to you via chatbot; sending postal mail, e-mails, and text messages; analyzing data; investigating fraudulent activity; conducting customer surveys. We may share personal information with such service providers as necessary for the third party to provide that service.

Categories of personal information collected	Purposes for the collection or disclosure or personal information	Third parties with whom personal information may have been disclosed
Basic Identifiers	• Providing the Service • Business operations • Communicating with You • Business operations • With your consent • As required by applicable law	• Service Providers on referral basis only as part of your care.

Demographic Information

- Providing the Service
- Communicating with You
- Referrals
- Analytics and Personalization
- Service Providers

To make sure that your health information is protected in a way that does not interfere with your health care, your information can be used and shared:

- For your treatment and care coordination
- To pay doctors and hospitals for your health care and to help run their businesses
- With your family, relatives, friends, or others you identify who are involved with your health care or your health care bills, unless you object
- To make sure doctors give good care and nursing homes are clean and safe
- To protect the public's health, such as by reporting when the flu is in your area

- To make required reports to the police, such as reporting gunshot wounds

Your health information cannot be used or shared without your written permission unless this law allows it. For example, without your authorization, your provider generally cannot:

- Give your information to your employer
- Use or share your information for marketing or advertising purposes or sell your information

Where We Store and Process Your Personal Information

Kareo Tebra, Inc. is based in the United States and uses service providers and have corporate affiliates that may be located outside of the United States.

If you submit personal information to us, your personal information may be processed in a foreign country, where privacy laws may be less stringent than the laws in the United States. By submitting your personal information to us, you agree to the transfer, storage, and processing of your personal information in a country other than your country of residence.

How We Protect Your Information

The security of your personal information is important to us. Personal information is maintained on our servers and those of our service providers, and may be accessible by authorized employees, representatives, and agents as necessary for the purposes described in this Policy.

Your Rights

Your health and well-being depend on a collaborative effort between you and provider in a mutually respectful alliance. You contribute to this alliance when you fulfill the responsibilities you have, to seek care and to be candid with your provider.

You have greater control over your own health information than ever before, due to federal legislation, and healthcare's focus on patient-centered care. You have

The right to look at your health information and/or get a paper or electronic copy of it.

- You have the right to read and review your health information. Access can be requested at any time. You have the right to get a paper or electronic copy of your health information in a timely manner according to federal law.

The right to accurate and complete health information.

- You have the right to expect that your health information is accurate and complete. The quality of the healthcare you receive depends upon accurate and complete health information. Incorrect or incomplete health information can prevent you from understanding your overall health and can keep you from receiving the care you need.

The right to ask for changes to your health information.

- You have the right to ask for changes to your health information when you think it is incorrect or incomplete. It is up to your doctor, hospital, or other healthcare providers whether the requested change will be made to the health record. The provider must notify you in a timely manner of the decision in writing. Your written or electronic request for changes will be kept with your health record.

The right to know how your health information is used or shared and who has received it.

- You have the right to a written explanation of how your health information is used. Your healthcare provider must give you a Notice of Privacy Practices that describes the possible uses and releases of your health information. You have a right to ask your provider for a list (an accounting) of those who have received your information. That list will not include information you agreed to be shared or used by those involved in the treatment, payment, or healthcare operations for your care.

The right to ask for limitations on the use and release of your health information.

- With the exception of emergency treatment, you have a right to ask for a limit on the health information your provider shares with others involved in your care or for the payment of your care. Your provider may deny the request but must provide you with a reason why. You may also ask, and a provider is required, to restrict certain information from your healthcare insurance company, provided you pay for that care out of your own pocket, and the information is not otherwise required by law.

The right to expect your health information is private and secure.

- You have the right to expect that your health information will be protected and kept secure from people who should not have it. You have the right to expect that your health information is kept secure when it is shared with authorized healthcare professionals. You also have the right to ask that your provider contact you in the way you prefer, such as by e-mail or phone.

The right to be informed about privacy and security breaches of your health information.

- You have the right to expect that organizations will hold staff responsible for any illegal access, use, or release of your health information. As required by law, you have the right to expect that any illegal use of your health information will be investigated and that you will be notified and given instructions on what to do next.

The right to file a complaint or report a violation regarding your health information.

- You have the right to file a complaint if you think your health information is not being handled correctly. You have a right to expect a timely response. An organization's Notice of Privacy Practices must tell you how to file a complaint with the organization and with the United States Department of Health and Human Services.

The right to translate.

- Doctors who treat patients covered by Medicare or Medicaid are required to provide translation services to patients whose first language is not English. Also, certain medical documents must be translated for patients, such as treatment instructions, questionnaires, and consent forms.

Questions?

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