



GENOA, a QoL HEALTHCARE COMPANY, LLC

WEBSITE PRIVACY POLICY

PLEASE READ THIS WEBSITE PRIVACY POLICY CAREFULLY BEFORE USING THIS WEBSITE, OR SUBMITTING ANY PROTECTED HEALTH INFORMATION OR PERSONALLY IDENTIFIABLE INFORMATION VIA THIS WEBSITE.

This Website Privacy Policy (the "Website Privacy Policy") outlines the types of Protected Health Information and Other Personally Identifying Information that Genoa, a QoL Healthcare Company, LLC (d/b/a "Genoa, a QoL Healthcare Company", "Genoa" or "we") may collect when you use this website (the "Website") how we use and may disclose that information, as well as the steps we take to safeguard it. Additionally, this Website Privacy Policy describes your rights with regard to Protected Health Information and other Personally Identifying Information.

We urge you to read this Website Privacy Policy in its entirety. It will help you make an informed decision about sharing your Protected Health Information and other Personally Identifying Information with us.

Genoa reserves the right to change this Website Privacy Policy at any time. Please check this page periodically for changes. Your continued use of this Website or Genoa's products or services following the posting of changes to these terms will mean you accept these changes. Genoa will take reasonable measures to notify you if there is a material change in our Privacy Practices with respect to use of the information you have provided to Genoa. Genoa will post these changes on the Website. If you have any questions about this Website Privacy Policy, Genoa's Privacy Practices, or feel that your privacy has been compromised, please contact us either through email at compliance@genoa-qol.com, by mail at 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188, or by phone at (844) 816-7722.

DEFINITIONS

Capitalized terms not otherwise defined in this Website Privacy Policy have the following definitions:

"Business Associate" shall have the meaning set forth in HIPAA.

"Business Associate Agreement" means an agreement between Genoa and a Business Associate as required under HIPAA.

"HIPAA" the Health Insurance Portability and Accountability Act of 1996.

"HITECH Act" means the Health Information Technology for Economic and Clinical Health Act, enacted as part of the American Recovery and Reinvestment Act of 2009.

"Protected Health Information" or "PHI" is information that we create or obtain in providing services to you. PHI includes, without limitation, information such as the documentation of your symptoms, examination, test results, pharmacy records, diagnoses and care or treatment, information pertaining to your past, present and future care, demographics and billing, insurance and related medical information.

"Other Personally Identifying Information" is information other than Protected Health Information that individually identifies you or from which your identity may be derived, such as your name, company name, physical address, Internet protocol address, phone number, e-mail address, and other information that would allow someone to identify or contact you.

“User” means a user of this Website.

GENERAL PRIVACY PRINCIPLES

Genoa has in place privacy and security policies under HIPAA (“HIPAA Privacy and Security Policies”). Genoa’s HIPAA Privacy and Security Policies are summarized in a written notice of Privacy Practices (“Notice of Privacy Practices”).

Accountability:

Genoa has appointed an officer who is accountable for Genoa’s compliance with this Website Privacy Policy who can be reached by e-mail at compliance@genoa-qol.com, by phone at (844) 816-7722, or by mail at 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188.

General Statement about What Types of Information Genoa may Collect, Track and Use:

Scope:

This Website Privacy Policy applies to all websites owned and operated by Genoa and to any and all Protected Health Information and Other Personally Identifying Information collected by Genoa via Genoa’s websites. It is designed to inform you of when, why, how and for what purpose Genoa collects such information from Users at this Website and Genoa’s other websites. Our Website Privacy Policy is designed to inform you about our use and disclosure of Protected Health Information and Other Personally Identifying Information collected at Genoa websites and to whom and for what purposes such information may be disclosed. Our Website Privacy Policy is also designed to inform you about how you may access, amend, or delete Protected Health Information and Other Personally Identifying Information collected by Genoa and how you may limit Genoa’s use of your Protected Health Information and Other Personally Identifying Information.

On occasion, Genoa’s websites are connected by "hyperlinks" to other companies' websites. Please note that Genoa is not responsible in any way for the Privacy Practices of other websites, and suggests and encourages that you review the Privacy Policies of those other companies' websites before using them.

When you use this Website:

Genoa may ask for and collect Protected Health Information and Other Personally Identifying Information at this Website. We may use the Other Personally Identifying Information that you submit so that we can better understand your needs, inform you about our services, or comply with the law. Of course, you may choose not to provide Genoa with Protected Health Information or Other Personally Identifying Information. However, this choice may prevent Genoa from providing you with the product, service or information you requested or that could be offered to you.

Limited Use, Disclosure and Retention:

Except as otherwise permitted or required under applicable law, Genoa does not use your Protected Health Information other than to carry out treatment, payment and healthcare operations. Except as otherwise permitted or required under applicable law, Genoa does not use, disclose or retain your Other Personally Identifying Information for purposes other than those for which it was collected.

Accuracy:

You have the right to update, modify, amend or correct errors in your Protected Health Information and Other Personally Identifying Information by contacting Genoa by email at compliance@genoa-qol.com, by phone at (844) 816-7722, or by mail at 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188.

Safeguards:

Genoa protects your Protected Health Information and Other Personally Identifying Information by using appropriate administrative, physical and technical safeguards and policies as set forth in Genoa's HIPAA Privacy and Security Policies ("HIPAA Privacy and Security Policies"). Each of our employees who have access to your Protected Health Information and Other Personally Identifying Information is regularly trained about Genoa's HIPAA Privacy and Security Policies.

Unfortunately, neither Genoa's computer systems, computer or telecommunications network, nor data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your Protected Health Information and Other Personally Identifying Information, Genoa cannot absolutely ensure or warrant the security of your Protected Health Information or Other Personally Identifying Information.

Openness:

Genoa's Notice of Privacy Practices may be obtained by making a request in person at any Genoa pharmacy; by submitting a request in writing to 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188, by making a request over the phone at (844) 816-7722, or by making a request online through our website at www.genoahealthcare.com/contactus.asp. This Website Privacy Policy is in accordance with Genoa's HIPAA Privacy and Security Policies.

Access:

Upon request in writing, either by e-mail or letter to compliance@genoa-qol.com, or 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188, you will be given access to your Protected Health Information or Other Personally Identifying Information. Genoa will assist any User who informs us that they need assistance in preparing a request concerning Protected Health Information or Other Personally Identifying Information. You may also challenge, in writing either by e-mail or letter to compliance@genoa-qol.com, or 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188, the accuracy and completeness of your Protected Health Information and/or Other Personally Identifying Information and have it amended as set forth in this Website Privacy Policy, or request that Genoa delete or correct any Protected Health Information or Other Personally Identifying Information contained in your file.

Challenging Compliance:

You may address any challenge concerning our compliance with this Website Privacy Policy at compliance@genoa-qol.com, by phone at (844) 816-7722, or by mail at 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188.

What Types of Information Does Genoa Collect?

On Each Visit to a Genoa Website Including this Website:

Genoa collects certain limited information, including Other Personally Identifying Information, your browser makes available whenever you visit a Genoa website including this Website. This information includes your Internet Protocol address, browser type, browser language, as well as the date and time of your visit. We use this information to operate, develop, and improve our websites. This information does not include Protected Health Information.

When you Pay your Bill Online:

If you opt to pay your bill online, you may be required to submit certain information into our secure website. For example, we may ask you to enter certain Personally Identifying Information (including, without limitation, username, email address, billing information, company name, contact name, address and phone number). We may also ask for a fax number, but submission of this is optional. We may combine the information that you submit under your account with information from other Genoa services or third parties in order to provide you with a better experience or to improve the quality of our products and/or services.

How Does Genoa Use Your Protected Health Information?

Treatment:

Genoa will use and disclose your Protected Health Information to provide you with medical treatment, healthcare products and healthcare related services, and for the coordination and management of medical treatment and healthcare related services. For example, nurses, physicians and other members of your treatment team will record information in your medical record and use it to determine the most appropriate course of care. We may communicate to other health care providers who are participating in your treatment, to pharmacists who are filling and refilling your prescriptions, and to your designees who are helping with your care.

Payment:

Genoa will use and disclose your Protected Health Information and other identifiable information in order to obtain payment for your medical treatment, healthcare products and healthcare related services. For example, Genoa may need to obtain authorization from your insurance company before providing certain types of treatment or medication. Further, if your health plan or insurance company requires pre-payment determination of medical necessity, we will provide them with the information and documentation necessary for such purposes. Genoa will also submit claims and bills to, and maintain records of payments from, your health plan or insurance company.

Health Care Operations:

Genoa will use and disclose your Protected Health Information to conduct and support our internal operations including, without limitation, training employees, proper dispensing of medication, and evaluation of the quality of treatment with your provider. We may also use or disclose your Protected Health information to our legal or insurance providers or Business Associates who require this information to provide us with their services.

Release of Protected Health Information to Family or Friends:

Genoa knows that family or friends are an integral part of a patient's care. If you wish to authorize a family member or friend to speak with us regarding your care or test results, please provide us with written consent to do so. Except as otherwise set forth in this Website Privacy Policy, Genoa will not release your information to any friend or family without your written consent.

Special Uses:

Genoa may use your Protected Health Information to contact you with appointment reminders by phone or mail. Genoa may also contact you to provide information about treatment alternatives or other health-related benefits and services that may be of interest to you. When we communicate or disclose your Protected Health Information as set forth in this Website Privacy Policy, we may do so by means including, without limitation, hard copy, telephone, fax, or other means of telecommunications. If you have granted written permission, the above information may also be sent to you via email. If you wish to authorize the use of email as a method for Genoa to communicate with you, please provide us with written consent to do so.

Other Uses and Disclosures:

Genoa may use or disclose Protected Health Information about you for other reasons, even without your consent. Subject to certain requirements, Genoa is permitted to disclose Protected Health Information without your permission for the following purposes:

- **Required by Law:** Genoa may be required by law to report gunshot wounds, suspected abuse or neglect, other similar injuries and events, or as otherwise required or permitted under applicable law.

- **Research:** Genoa may use or disclose Protected Health Information for medical research when such research has been approved by an institutional review board that has reviewed the research proposal and established protocols to ensure the privacy of your Protected Health Information.
- **Public Health Activities and Disaster Relief:** Genoa may disclose your Protected Health Information to public health or legal authorities, and to assist in disaster relief efforts.
- **Health Oversight:** Genoa may disclose your Protected Health Information to assist in investigations and audits, eligibility for government programs, and similar activities.
- **Judicial and Administrative Proceedings:** Genoa may disclose your Protected Health Information in response to an appropriate subpoena or court order.
- **Law Enforcement Purposes:** As required or permitted under applicable law, Genoa may disclose your Protected Health Information to law enforcement officials including, pursuant to a court order or cases involving felony prosecutions, or to the extent an individual is in the custody of law enforcement.
- **Deaths:** Consistent with applicable law, we may report information regarding deaths to coroners, medical examiners, funeral directors, and agencies engaged in the procurement, banking or transplantation of organs to allow them to carry out their duties.
- **Serious Threat to Health or Safety:** As required or permitted under applicable law, Genoa may use and disclose your Protected Health Information when necessary to prevent or lessen a serious, imminent threat to your health and safety or the health and safety of the public or another person.
- **Military and Special Government Functions:** If you are a member of the armed forces, Genoa may release your Protected Health Information as required by military personnel, for national security purposes or to public assistance program personnel.
- **Workers' Compensation:** Genoa may disclose Protected Health Information about you for workers' compensation or similar programs providing benefits for work-related injuries or illness to the extent necessary to comply with applicable law.
- **Correctional Institutions:** If you are an inmate of a correctional institution, Genoa may disclose to the institution or its agents your Protected Health Information as necessary for your health and the health and safety of other individuals.

In any other situation, we will ask for your written authorization before using or disclosing any Protected Health Information about you. If you choose to sign an authorization to disclose information, you can later revoke that authorization to stop any future uses and disclosures as described below.

Individual Rights:

You have the following rights with regard to your health information. Please submit any concerns in writing to Genoa's Privacy Officer using the contact information shown at the end of this policy.

- **Request Restrictions:** You may request restrictions on certain uses and disclosures of your Protected Health Information. Genoa is not required to agree to such restrictions, but if we do agree, Genoa will abide by those restrictions unless a disclosure is necessary to provide urgent treatment.
- **Inspect and Obtain Copies:** You have the right to inspect and receive a copy of your health records and billing records as long as we maintain them. You may make a request to inspect and/or copy these records by sending your request to our Privacy Officer using the contact information available at the end of this policy. There may be a small charge dictated by state law for copying your records. In limited circumstances, we may deny your

access to Protected Health Information. You may appeal a denial of access to your Protected Health Information in writing to the Privacy Officer.

- **Amend Information:** If you believe your Protected Health Information in your record is incorrect, you have the right to request that Genoa correct or amend the existing information for as long as we maintain your record. In limited circumstances such as where we believe that your record is both complete and accurate or it was not created by Genoa, we have the right to refuse your request. If we refuse your request, you have the right to file a statement of disagreement with Genoa. You may also request that we attach an amendment request and our denial to all future disclosures of your Protected Health Information. We may prepare a rebuttal to your statement. We will provide you with a copy of any rebuttal prepared by Genoa.
- **Accounting of Disclosures:** You may request a list of instances where we have disclosed Protected Health Information about you for reasons other than treatment, payment, or health care operations.
- **Alternative Means of Communication:** You may request that communications of your Protected Health Information be made by alternative means or to an alternative location by making a written request to Genoa.
- **Revocation of Authorizations:** You have the right to revoke authorizations that you have made previously to use or disclose information except to the extent that a disclosure or action has already been taken. You may revoke authorizations by delivery of a written revocation to Genoa.

Any of the foregoing rights may be exercised by contacting our Privacy Officer, by e-mail at compliance@genoa-qol.com, by phone at (844) 816-7722, or by mail at 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188.

ADDITIONAL RIGHTS UNDER THE HITECH ACT:

HITECH Act Notification Requirements

Under the HITECH Act, we are required to notify you if your Protected Health Information has been breached. We will notify you by first class mail or other means permitted under the HITECH Act within 60 days of a breach event. A breach event occurs when an unauthorized use or disclosure of Protected Health Information that compromises the privacy or security of Protected Health Information poses a significant risk for financial, reputational or other harm to you. Our notice will contain (a) a brief description of what happened, including the date of the breach and the date that we discovered the breach, (b) the steps that you should take to protect yourself from potential harm resulting from the breach, and (c) a brief description of what Genoa is doing to investigate the breach, mitigate losses, and protect against further breaches.

Genoa's Business Associates

Genoa will provide in its Business Associate Agreements that the privacy and security required under HIPAA and HITECH apply directly to the Business Associate.

Rights of Patients Choosing to Pay in Cash

If you choose to pay in full for the services that Genoa provides to you out of pocket, you may request that the information regarding the services provided not be disclosed to your third party payer since no claim is being made to the third party payer.

Access to Electronic Health Records

You have the right to access your own electronic health records in an electronic format and to direct Genoa to send your electronic health records directly to a third party. We may charge for labor costs associated with these requests and directives.

Accounting of Disclosures

Beginning not later than January 1, 2014, upon your request, we will provide an accounting of disclosures of your Protected Health Information that we make through an electronic health record to carry out treatment, for payment, and for health care operations within the three (3) year period prior to your request. Such accounting will either (a) provide you with an accounting of such disclosures of your Protected Health Information made by Genoa and all disclosures made by Genoa's Business Associates, or (b) provide you with an accounting of such disclosures of your Protected Health Information made by Genoa and a list of Genoa's Business Associates, including their contact information so that you may contact our Business Associates to request an accounting of such disclosures of your Protected Health Information made by them.

OUR LEGAL DUTY:

General:

We are required by law to protect and maintain the privacy of your Protected Health Information and Other Personally Identifying Information, to provide this Website Privacy Policy and our Notice of Privacy Practices, and to abide by the terms of the Website Privacy and our HIPAA Privacy and Security Policies currently in effect.

Complaints:

If you are concerned that your rights have been violated, or if you disagree with a decision we made about your records, you may contact the person listed below. You may also send a written complaint to the U.S. Department of Health and Human Services. The person listed below will provide you with the appropriate address upon request. We cannot and will not require you to waive the right to file a complaint with the U.S. Department of Health and Human Services as a condition of receiving treatment from Genoa. You will not be penalized in any way for filing a complaint.

For additional information, please contact:

Privacy Officer via email at compliance@genoa-qol.com, by mail at 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188, or by phone at (844) 816-7722.

Protection:

Genoa may store and process Protected Health Information and Other Personally Identifying Information collected on this Website or our other websites on our own servers or on the servers of our affiliates or Business Associates who have entered into Business Associate Agreements with Genoa. Paper copies containing all or part of the Protected Health Information or Other Personally Identifying Information you supply to us may be made and kept in our files. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate administrative, physical and technical safeguards and policies to secure the Protected Health Information or Other Personally Identifying Information we collect. We review our administrative, physical and technical safeguards and HIPAA Privacy and Security Policies on a periodic basis.

Data Integrity:

We take reasonable steps to determine if the Protected Health Information and Other Personally Identifying Information that we process is accurate, complete and current, but we depend upon our Users to update or correct their Protected Health Information and Other Personally Identifying Information submitted to us when necessary.

What about cookies?

A "cookie" is a small file containing data related to your session that is sent to your browser from a web server and stored on your computer hard drive when you visit some websites. We reserve the right to use cookies in connection with this Website. We use cookies to improve the quality of our Website and/or services. We may set

one or more cookies in your browser when you visit a Genoa website. You may decline to accept cookies in your browser, although some of our features or services may not function properly as a result.

Opting-out:

Even after you have granted Genoa your consent to collect Protected Health Information and Other Personally Identifying Information, you may opt-out of having your Protected Health Information collected by contacting us by e-mail or regular mail. Please note that in order to fulfill certain obligations, we may need to continue sending you notices or other important information concerning any products or services you request. If you wish not to receive e-mail or other communications from Genoa and wish not to have your information shared with third parties as set forth in this Website Privacy Policy, you may send your request to Privacy Officer via email at compliance@genoa-qol.com, by mail at 18300 Cascade Avenue South, Suite 251, Tukwila, WA 98188, or by phone at (844) 816-7722.

CONSENT:

YOUR KNOWLEDGE AND CONSENT ARE REQUIRED FOR THE COLLECTION, USE, OR DISCLOSURE OF YOUR PROTECTED HEALTH INFORMATION AND OTHER PERSONALLY IDENTIFYING INFORMATION. BY SUBMITTING SUCH TO GENOA, WHETHER THROUGH THIS WEBSITE OR BY SIGNING OUR NOTICE OF PRIVACY PRACTICES, YOU HEREBY CONSENT TO GENOA'S COLLECTION, USE AND DISCLOSURE OF SUCH INFORMATION AS SET FORTH IN THIS WEBSITE PRIVACY POLICY. IF YOU DO NOT CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF YOUR PROTECTED HEALTH INFORMATION AND OTHER PERSONALLY IDENTIFYING INFORMATION AS DESCRIBED IN THIS WEBSITE PRIVACY POLICY, YOU SHOULD NOT CONTINUE TO USE THIS WEBSITE OR ANY OTHER GENOA WEBSITE, OR SUBMIT SUCH INFORMATION TO GENOA VIA THIS WEBSITE OR ANY OTHER GENOA WEBSITE.

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