



RelayHealth Legal Notices

PRIVACY POLICY

Revised August 2010

This policy only applies to those RelayHealth services for which you also must accept RelayHealth's Terms of Use. RelayHealth respects your privacy and takes Internet privacy very seriously. By accepting RelayHealth's Terms of Use, you consent to the use and disclosure of personally identifiable information provided to us as outlined in this Privacy Policy.

Who Is Collecting Information?

RelayHealth provides you, your physician, Provider-Designated User or authorized member of a Provider Group with the ability to communicate with each other regarding medical issues and/or general health matters. Because RelayHealth provides a service for Web-based communication between you and your healthcare professional ("Provider"), we ask you for the sort of personal information your Provider's office needs in order to respond to and streamline the processing of your requests. Certain subscriber contact information is collected when you register (for example name, email address, home zip code, date of birth).

We will not sell, share or rent this information that is collected in the RelayHealth service to others in ways different than from what is disclosed in this policy. RelayHealth collects information from you at several points in our service.

What Information Is Collected?

- **Subscriber Contact Information.**

- **Information Request.** If you wish to request more information about RelayHealth prior to registering, you are required to provide contact information so that RelayHealth can contact you about services. It is optional for you to provide additional contact information (for example, health plan and physician).
- **Pre-Registration.** At your option and with your consent, your Provider or a member of your Provider's staff may elect to pre-register you for RelayHealth. The pre-registration process requires the collection of your contact information. Your Provider may provide additional information, such as your health plan. This information will be used by RelayHealth to contact you about our services. In order to complete the registration process to use RelayHealth, you will be asked to confirm the information provided and agree to RelayHealth's Terms of Use. You may request not to receive information from RelayHealth at any time.
- **Registration.** Upon registration, you may provide additional contact information (for example, health plan, health plan subscriber ID number, home phone number, and home address). We encourage you to provide this information in order to enable optimal use of our service. In many cases, you will be asked to enter this contact information directly. In other cases, that information may be pre-filled if you have already provided it to a related product or registration process of a business partner site and have consented to its disclosure to RelayHealth through that business partner site. In circumstances where the information has been pre-filled by someone other than you, you will be asked to confirm the information provided and agree to RelayHealth's Terms of Use before being able to use RelayHealth.

When you register at RelayHealth, the registration process requires you to choose a unique identifier (for example, sign in name and password) for your account. If you arrive are registered through a business partner site, the business partner site may provide a unique identifier that confirms to RelayHealth that you are an authorized member from the business partner site. You will be asked to confirm the information provided and agree to RelayHealth's Terms of Use before being able to use RelayHealth.

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- **Subscriber Medical Information.**

- **Provider-Patient Communications.** RelayHealth offers various messaging platforms relating to specific requests and/or purposes to facilitate communications (for example, Referral Requests, Prescription Renewal Request; Appointment Request). Either you or your Provider, Provider-Designated User or authorized member of a Provider Group can initiate such messages and/or communications. Your response and/or provision of information regarding these communications is voluntary; therefore, you have a choice whether or not to disclose this information.

Information provided via these communications may be used to update your Health Record. In addition, by initiating and/or responding to such communications, your Health Record will be accessible to your Provider, Provider-Designated User or authorized member of a Provider Group. Certain communications (for example, e-mails, messages) are recorded and maintained by RelayHealth. RelayHealth will not edit the content of the communication between you and your Provider, Provider-Designated User or authorized member of a Provider Group. RelayHealth considers these communications to be personal and private and will not use or disclose these communications except as provided for in this Privacy Policy or where required by law or unless you agree to additional use and disclosure of information provided via RelayHealth. However, RelayHealth may block or remove certain communications materials (for example, offensive or otherwise unacceptable materials for which a complaint has been reported).

- **Provider Health Information.** From time to time, your Provider or a member of your Provider's staff may provide medical or other information contained in their medical records or patient files to update or supplement your Health Record or other information about you in our service. This may include sharing of information about you via integration between our service and certain systems used by your Provider containing information about you (for example, medical record-keeping/storage systems, billing systems). The provision and sharing of this information is optional by your Provider and based upon your consent. In addition, RelayHealth may share information provided by you in your Health Record or in our service to update and supplement your medical or other information with your Provider or contained in your Provider's systems.
- **Health Record.** The Health Record is a tool that permits you to provide and store health information online, including health conditions, allergies and medications. You have the ability to enter information into your Health Record directly. In addition, where you have authorized another person (a "Patient Account Manager") to access your Health Record, those individuals authorized by you will also have the ability to enter information into your Health Record. Your Provider, a Provider Designated User or authorized member of a Provider Group may also enter information into your Health Record.
- **Pre-Filled Health Record.** In certain cases and at your election, you may be able to opt-in to having your Health Record information pre-filled and updated by a business partner where that business partner has obtained the necessary consents from you to disclose this information to RelayHealth. In addition, at your option and based upon consents received from you by your physician, your physician may elect to pre-fill medical information and create a Health Record for you via RelayHealth. The creation of a Health Record may include the collection of contact information, as well as certain health information about you, including health conditions, medications and allergies. The provision of this information is optional by your physician based upon consents your physician has received from you. This information may be used by RelayHealth to contact you about our services. In order to register to use RelayHealth, you will be asked to confirm the information provided, review your Health Record and agree to RelayHealth's Terms of Use. You have the ability to request not to receive information from RelayHealth at any time.
- **WebVisit[®].** The webVisit is an interactive interview guiding a patient through clinically relevant questions based on clinical care algorithms to aid the Provider, Provider Designated-User or authorized member of a Provider Group in making an accurate and thorough medical assessment of the complaint. Your Provider, Provider-Designated User or authorized member of a Provider Group will have access to your Health Record during the webVisit. Once you initiate a webVisit, you will be asked to enter additional health information specific to the symptom you selected. Participation in a webVisit is voluntary and you therefore have a choice whether or not to disclose this information. Information provided by you via a webVisit may be used to update your Health Record.
- **Subscriber Credit Card and Health Plan/Payor Information.** RelayHealth requests financial information and any relevant health plan or other payor information from you. On the Personal information Web page of your Health Record you may provide health plan information. On the Account Information Web page you must provide credit card information to complete the transaction when your Provider chooses to charge you a fee for a webVisit. This information is used for billing purposes.
- **Subscriber Log Files.** RelayHealth collects and stores the Internet Protocol (IP) address of the computer you are using; the name of the domain and host from which you access the Internet; the browser software you use and your operating system; the date and time you access the service; and the Internet address of the Web site from which you directly linked to RelayHealth. RelayHealth uses this log file information to analyze trends, administer the service, and monitor service traffic and usage patterns for internal security purposes and to help make the RelayHealth service more useful.
- [BACK TO TOP](#) **Provider and Provider-Designated User Information.**
 - **Provider Registration.** When Provider arrives at RelayHealth, we require the collection of certain contact information as part of the Provider registration process (for example, name, medical license number and state

of issue, primary specialty, office address, office zip code). It is optional for you to provide additional contact information (for example, office fax, e-mail address date of birth, and secondary specialty), but you are encouraged to provide this information in order to enable optimal use of our service. In many cases, you will be asked to enter this contact information directly. In other cases that information may be pre-filled if you have already provided it to a related product or registration process of a business partner site and have consented to its disclosure to RelayHealth through that business partner site. In circumstances there the information has been pre-filled by someone other than you, you will be asked to confirm the information provided and agree to RelayHealth's Terms of Use before being able to use RelayHealth.

When you register at RelayHealth directly, the registration process requires you to choose a unique identifier (for example, sign in name and password) for your account. If you arrive at RelayHealth through a business partner site, the business partner site may provide a unique identifier that confirms to RelayHealth that you are an authorized member from the business partner site. You will be asked to confirm the information provided and agree to RelayHealth's Terms of Use before being able to use RelayHealth.

- **Provider-Designated User Registration.** We require the collection of certain contact information as part of the Provider-Designated User registration process (for example, name, user function, office zip code). It is optional for you to provide unique contact information (for example, office fax, e-mail address), but you are encouraged to provide this information in order to enable optimal use of our service. In many cases, you will be asked to enter this contact information directly. In other cases that information may be pre-filled if you have already provided it to a related product or registration process of a business partner site and have consented to its disclosure to RelayHealth through that business partner site. In circumstances there the information has been pre-filled by someone other than you, you will be asked to confirm the information provided and agree to RelayHealth's Terms of Use before being able to use RelayHealth.

When you register at RelayHealth, the registration process requires you to choose a unique identifier (for example, sign in name and password) for your account. If you arrive at RelayHealth through a business partner site, the business partner site may provide a unique identifier that confirms to RelayHealth that you are an authorized member from the business partner site. You will be asked to confirm the information provided and agree to RelayHealth's Terms of Use before being able to use RelayHealth.

- **Address Book.** RelayHealth provides you with the opportunity to create an Address Book to store contact and other information regarding registered and non-registered providers. The creation and use of the Address Book is completely voluntary and you therefore have a choice whether or not to disclose this information.
 - **Billing Information.** RelayHealth requests billing information from you via a Billing Form. Here you must provide RelayHealth with billing information (for example, credit card information) for your use and access to RelayHealth. This information is used for billing purposes.
 - **Log Files.** RelayHealth collects and stores the Internet protocol address of the computer you are using; the name of the domain and host from which you access the Internet; the browser software you use and your operating system; the date and time you access the service; and the Internet address of the Web site from which you directly linked to RelayHealth. RelayHealth uses this log file information to analyze trends, administer the service, and monitor service traffic and usage patterns for internal security purposes and to help make the RelayHealth service more useful.
- **Guest Provider Information**
 - **Contact Information.** In circumstances where a Provider, Provider-Designated User or authorized member of a Provider Group determines it to be clinically appropriate, that Provider, Provider-Designated User or authorized member of a Provider Group may provide RelayHealth with contact information about a non-registered provider (for example, name, e-mail address, facsimile number) in order to send the non-registered provider a Provider Patient Referral request. This information will be used by RelayHealth to send you the Provider Patient Referral form. In order to respond to a Provider Patient Referral request, you will be asked to confirm the information provided and agree to RelayHealth's Guest Provider Terms of Use. You have the ability to request not to receive Provider Patient Referral requests at any time.
 - **Guest Provider Registration.** Upon registration, RelayHealth requires you to use the unique identifier (for example, sign in name and password) provided to you as part of the Provider Patient Referral request. In order to respond to a Provider Patient Referral request and/or access RelayHealth, you will be asked to confirm the information provided about you and agree to RelayHealth's Guest Provider Terms of Use.
 - **Log Files.** RelayHealth collects and stores the Internet protocol address of the computer you are using; the name of the domain and host from which you access the Internet; the browser software you use and your

operating system; the date and time you access the service; and the Internet address of the Web site from which you directly linked to RelayHealth. RelayHealth uses this log file information to analyze trends, administer the service, and monitor service traffic and usage patterns for internal security purposes and to help make the RelayHealth service more useful.

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How Will Your Information Be Used And

Disclosed?

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

- **Use of Subscriber Information**

- RelayHealth maintains an audit trail that keeps track of who has seen your RelayHealth account and/or Health Record and whether any changes to your account and/or Health Record have occurred. You have the ability to view this audit trail to see all viewers of your account and/or Health Record.
- You may always view all the information you voluntarily entered in RelayHealth.
- If another individual is managing your account with your permission (for example, mother managing account of her son), this Patient Account Manager can view all your information entered in RelayHealth on your behalf.
- Your Provider, a Provider-Designated User or authorized member of a Provider Group can use contact and/or health information about you stored by RelayHealth for many purposes including:
 - Inviting you to register for RelayHealth and constructing and updating your Health Record
 - Screen for drug and allergy interactions or screen for formulary compliance,
 - Identifying and providing educational materials, sending appointment reminders and wellness information
 - Send prescription information to pharmacies, and updating your Health Record based upon interactive communications and your use of RelayHealth (including prescription information)
- RelayHealth uses the contact and health information you supply for purposes related to your healthcare and the services we provide, such as:
 - Inviting you to register for RelayHealth and constructing and updating your Health Record
 - Supplying required information to pharmacies to fill your prescription, claim information to your health plan reimbursing your webVisits and certain claims data in order to facilitate and coordinate your receipt of certain insurance benefits
 - Providing you with appointment reminders, educational materials, and wellness information
 - Surveying you on our services and responding to customer service requests
 - Providing information as required by law
 - Using your Provider and/or insurance plan information to customize your experience, or to show your Provider's and/or insurer's logo on RelayHealth Web pages.
- RelayHealth uses the contact and billing information you supply to bill and provide claims data for webVisits should your Provider elect to charge a fee.
- RelayHealth may use the contact, billing and/or health information provided by you in our service to provide your physician or other healthcare provider with updated and/or supplemental information for their files or systems.

- **Disclosure of Subscriber Information.**

- **Health Record.**
 - Once you ask your Provider to communicate with you using RelayHealth, your Provider, a Provider-Designated User or authorized member of a Provider Group may review your Health Record and adjust it and respond to your messages. If you would like to update or change information in your Health Record, you can send a message to your Provider stating the change or correction you think is needed or you may update your Health Record directly.
 - Your Health Record, contact and health information is available to your Provider at all times when you communicate with your Provider, Provider-Designated User or authorized member of a Provider Group or when they respond to your questions or requests.
 - If you have authorized a Patient Account Manager to access your Health Record, those individuals authorized by you will also have the ability to access your Health Record and update or change information in your Health Record.
 - Where your Provider, Provider-Designated User or authorized member of a Provider Group authorized by you determines that it is clinically appropriate, they may send a referral message to another provider and/or refer you as a patient to another provider. This referral message may include personally identifiable medical and/or health information about you, including, but not limited to, your Health Record. Although the consulting

provider may be able to view this information, they are not able to update and/or edit your Health Record.

- **Sharing of Information with Providers.** RelayHealth may disclose the contact, billing and/or health information provided by you in our service to provide your physician or other healthcare provider with updated and/or supplemental information for their files or systems about you.
- **Compliance with Laws.** RelayHealth will not disclose personal information (contact, health and/or billing) to third parties other than a provided for in this Privacy Policy, except when we believe in good faith that the law requires it or you have otherwise consented to additional use or disclosure of the information.
- **Pharmacies and Pharmacy Benefits.** When you or your Provider uses the RelayHealth service to send your prescription to a pharmacy, we will release your name, address, prescription information and insurance plan/payment information to the pharmacy. In addition, we may disclose certain necessary claims data to other entities (for example, the provider of your drug benefit) as required to facilitate and/or coordinate your pharmacy benefits (for example, health plan, mailing address, billing information for copayment purposes).
- **Health Plans.** When your physician elects to charge for a webVisit and your health plan has an agreement with RelayHealth to cover webVisits, we will release your contact information, the date of service, a service descriptor, and the service charge to your health plan for payment purposes. RelayHealth may also provide information to a Health Plan that you have indicated to RelayHealth that you are affiliated with that Health Plan.
- **Business Partners.** RelayHealth works with many business partners in making our services available to consumers. It is our policy to ask companies with whom we do business to support the same privacy policy we do. When you sign up for these services, we will share information only as necessary for the third party to provide these services. These parties are not allowed to use personally identifiable information except for the purpose of providing these services.
- **Third Parties.** If you use RelayHealth to link to another Web site, you may decide to disclose personal information at that Web site. For example, you might provide your contact information to obtain an information packet from an organization. Please be aware that in contacting that site, or in providing information on that site, that third party may obtain personal information about you. This Privacy Policy does not apply when you leave RelayHealth and go to a third party Web site from RelayHealth. We structure the RelayHealth service so that no personal or health information goes in the search string or URL when you move from the RelayHealth service to a linked Web site. We encourage you to be aware when you leave our service and to read the privacy statements of each and every site that collects personally identifiable information.
- **Use of Provider Information**
 - RelayHealth maintains an audit trail that keeps track of all messages sent by a Provider, Provider-Designated User or authorized member of a Provider Group. You have the ability to view this audit trail to see all messages sent via your account.
 - You can always view all the information you entered in RelayHealth voluntarily.
 - If you authorize an individual as a Provider-Designated User or authorized member of a Provider Group, that individual may access your messages and other account information with your permission and can respond on your behalf.
 - RelayHealth uses the information you supply for purposes that will be beneficial to your health care such as inviting you or your providers to register for Relay health, supplying information needed for filling prescriptions or billing or remitting payments, or offering you educational or preventive care information. In addition, Relay Health tracks prescribing and treatment trends and will provide information as required by law.
- **Disclosure of Provider Information.**
 - It is our policy to ask companies with whom we do business to support the same privacy policy we do. These parties are not allowed to use personally identifiable information except for the particular purpose for which it was provided.
 - RelayHealth will disclose the necessary provider information (for example, name, license number, provider number, etc) in order to submit claims to relevant health plans and payors that pay for services you provide via RelayHealth to your patients.
 - When you or your patient uses the RelayHealth service to send a prescription to a pharmacy, we will release the necessary provider information to the pharmacy in order to fill that prescription.
 - On occasion, RelayHealth may make arrangements with certain business partners (for example, PBMs) to share certain Provider prescribing pattern information. The information provided is not patient-specific ("patient de-identified"), but does include certain provider-specific information (for example, name, drugs prescribed, formulary status) in order to assist such business partners in evaluating prescribing patterns, utilization, usage trends, etc.
 - From time-to-time, RelayHealth may make available certain provider information (for example, name and/or DEA #) to potential business partners in order to provide an aggregate landscape of the RelayHealth Provider community (for example, aggregate number of providers, general types of providers). This information will not be used by the potential business partner for marketing and/or any other purpose.

- **Aggregate Data**

- Relay Health may use non-identifiable anonymous data that is taken from the Personal health information you provided and combine it with other anonymous data to create what is referred to as "aggregate data" that may be disclosed to third parties. Aggregate data is information that describes the habits, usage patterns and/or demographics of users as a group but does not reveal the identity of particular users. This data will not identify you but will be used as statistical information to determine such things as user demographics and usage patterns of our services. RelayHealth may use aggregate data within RelayHealth to understand the needs of the RelayHealth community of users and determine what kinds of programs and services we can help your Provider offer to you. Aggregate data may be provided or sold to third parties. RelayHealth may use this aggregate data to give potential users, providers, or business partners a picture of the RelayHealth community and services. Locator information is your name, electronic messaging address, physical address, and / or other data that enables someone to personally identify you. RelayHealth and your Internet Access Provider may use Locator Information as is necessary to enforce any of the terms of the RelayHealth Terms of Use.

Can Patients Opt Out or Opt In to Specific Uses Of Their Information?

- **Medical Information.**

- Unless you were pre-registered by your Provider, you, you must authorize your Provider to have access to your medical information by sending a message to which the Provider accepts you as a patient in the RelayHealth System. Your Provider has the ability to assign Provider-Designated Users and/or members of a Provider Group to receive your messages on his/her behalf and update/access your Health Record and other medical and health information.
- You may deactivate the Provider, Provider-Designated User and authorized member of a Provider Group by selecting the Provider deactivation option if you no longer wish to allow them to view your information. The Provider, Provider-Designated User and authorized member of the Provider Group will be able to view a static version of your Health Record as of the deactivation, but will no longer be able to view updates to your Health Record.
- You have the ability to request the activation or deactivation the authorization of a Patient Account Manager at any time by notifying your Provider. Once your Provider deactivates a Patient Account Manager, they will be able to view a static version of your Health Record as of the deactivation, but will no longer be able to view updates to your Health Record.

- **Invitations.**

- If you no longer wish to receive invitations to register for RelayHealth, you may request that your Provider no longer send invitations to you using RelayHealth.

Storage and Maintenance of Information

RelayHealth stores and maintains all electronic communications sent via RelayHealth, the content of all webVisits, your Health Record, contact information, financial information and all attachments and/or files uploaded or posted to RelayHealth for a period of at least ten (10) years. Additional information on the storage and maintenance of information is available upon request.

Security

RelayHealth takes all reasonable measures to secure your data on our servers, in our data center. Our data center is both physically and electronically secured. Our servers are protected behind the Internet by using a firewall which is a hardware and software system that blocks access by unauthorized parties.

For more information, please refer to RelayHealth's Security Measures.

Does RelayHealth Use Cookies?

A "cookie" is a small text file that RelayHealth transfers to your computer's hard drive in order to personalize our service for you and to collect aggregate, non-personal information regarding service usage by all of our users. Each computer is assigned a different cookie that contains a random, unique number. The cookie does not contain personally identifiable information. RelayHealth 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 RelayHealth website, as well as how the user arrived at the RelayHealth website (through an email link, or from a referral link, for example), and the type of user (patient, provider, etc.). So that users aren't counted twice, this cookie can "persist" anywhere from six months to two years. The persistent cookie is managed by Google Analytics and is, by design, anonymous.

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, you will not be able to use RelayHealth.

Since Sponsors or partners of RelayHealth may use their own cookies when you click on a hypertext link to their site or service, you should carefully review the privacy policy of other sites you link to from our service.

What can I do to protect my Privacy?

In order to protect your privacy while you can:

- Never share you sign in name or password
- Always sign out when you are finished using the service.

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

If you have any questions about this Privacy Policy or the use of your information via RelayHealth, please contact us at privacy@relayhealth.com.

How will you be notified about changes to this Privacy Policy?

RelayHealth reserves the right to change the terms of this Privacy Policy at any time by posting those changes on our service so that you are always aware of our processes related to collection, use and disclosure of information. We will inform you of any material change to our Privacy Policy that involves the use of your personal health information in order to give you the opportunity to opt-out for any additional uses or disclosures of your personal health information that you made available to us prior to any such change in our Privacy Policy.

In addition, we urge you to check here for any updates to this Privacy Policy from time to time.