

## **PRIVACY POLICY**

The Medical Society of Northern Virginia ("we", "us", "our" or "Company") operates the [www.doctorstelemed.org](http://www.doctorstelemed.org) website ("Site") and provides other telemedicine services. This policy applies to our website as well as to the services and applications we provide, collectively known as the "Services."

We are committed to ensuring that your personal information shared over our Site and/or Services is protected and kept confidential. By accepting Company's Terms of Use or providing information to us via our Site, you consent to the use and disclosure of personally identifiable information as outlined in this Privacy Policy. Please note that the use and disclosure of such information is also subject to the practices of the health care providers with whom you may interact through the Services, as described in the Notice of Privacy Practices which is provided to you by such providers.

## **INFORMATION COLLECTION**

Protected health information is information that includes, but is not limited to, identifying data such as name, social security number, address, contact information, as well as information about personal health issues submitted through the Services. Personally identifiable information may include all such types of information, except for health- or health-care-specific information. This is the information we aim to protect.

We will only collect information that you voluntarily submit. We know that privacy is of the utmost importance. We vigorously believe in keeping confidential any and all personally identifiable information that identifies an individual whether or not it relates to an individual's past, present, or future physical or mental health condition.

As a Business Associate of health care providers that are Covered Entities under the federal health care privacy and security rules (HIPAA and HITECH), we maintain protected health information (PHI) in compliance with these rules and our contractual obligations with health care providers. Currently our main focus is providing a platform to allow individuals to receive telehealth Services from various healthcare providers. We collect information solely for the purposes of providing the Services, marketing and promoting our Services to you and for market research data. We and our partners may also collect personally identifiable information for marketing, user experience monitoring and improvement and related business purposes.

We assume you are giving consent to this information collection and use, but we also give you the opportunity to "opt out" of receiving direct marketing or market research information by emailing us at [info@DoctorsTelemed.org](mailto:info@DoctorsTelemed.org)

We maintain web logs to record data about all visitors who use this site and interact with the Services and we will store this information. These logs may contain IP address information,

types of operating system you use, the date and time you visited the site, and information about the type of device you use to connect to the Services.

All Web logs are stored securely and are accessible to a very limited number of employees and contractors, who have to adhere to strict guidelines regarding user data security and privacy.

## **NON-PERSONAL IDENTIFICATION/COOKIES TECHNOLOGY**

What is a cookie? A cookie is a small data file that certain web sites write to your hard drive when you visit them. A cookie file, for instance, may collect user ID information such as items in a shopping cart while navigating a site, but the only personal information a cookie can contain is information you provide. Your user ID or profile information is not stored in cookies.

How do we use cookie technology? We use it in the aggregate as opposed to using any personally identifiable information, to understand how our users collectively use our Site. This helps us continually improve our Site.

Most web browsers are set to accept cookies, but if you prefer not to receive cookies you can set your browser to warn you or refuse cookies all together by turning them off in your browser.

We may also use non-personal information to analyze data into useful information. This process of data mining is done in the aggregate, is non-personal, and allows Company to find correlations and patterns in the data.

## **SECURITY OF INFORMATION COLLECTED**

We use account information in a password-protected environment as a security measure to protect your data. We use administrative, physical and technical safeguards to protect data. We maintain a high level of data protection via safeguards such as data backup, audit controls, access controls, and some data encryption. Our Site and the Services use industry standard SSL encryption to enhance security of electronic data transmissions. DoctorsTelemed® will maintain all applicable PCI DSS requirements to the extent that it has access to, or otherwise stores, processes or transmits cardholder data. DoctorsTelemed® is responsible for ensuring the security of your credit card/cardholder data that may be stored, processed, or transmitted on your behalf, in the context of a telehealth visit. DoctorsTelemed® will maintain all applicable PCI DSS requirements to the extent that it has access to, or otherwise stores, processes or transmits cardholder data.

In addition, we urge you to take precautionary measures in maintaining the integrity of your data. Please be responsible in making sure no one can see or has access to your personal account and log-in/password information. If you use a public computer, e.g., at a library or a university, always remember to log out of the Site or Services.

If you use our Site or Services through your employer's computer network or through an internet café, library or other potentially non-secure internet connection, such use is at your own risk. It is your responsibility to check beforehand on your employer's or such other site's privacy and security policy with respect to Internet use.

We are not responsible for your handling, sharing, re-sharing and/or distribution of your personal health information. Moreover, if you forward personal health information electronically to another person on or off the Site or Service, we are not responsible for any harm or other consequences from third party use or re-sharing of your information.

### **SELF REVIEW OF DATA AND ABILITY TO DELETE YOUR ACCOUNT INFORMATION**

You may request to delete any personal information and to de-authorize the collection of personal information in the future by sending us an email at [info@DoctorsTelemed.org](mailto:info@DoctorsTelemed.org)

### **THIRD PARTY SITES/TRUSTED RELATIONSHIPS**

As noted above, the Company is a Business Associate of health care providers under HIPAA and we share information with health care providers who provide services to individuals, and they share information with us, for purposes related to treatment, payment and health care operations, and otherwise as agreed or authorized by you.

Our Site contains links to other sites. We do not share your personally identifiable information with those sites (unless you specifically authorize such sharing) and are not responsible for their privacy procedures. We seek to work with trusted partners and organizations that will adhere to similar privacy and ethical standards. However, we encourage you to learn their particular privacy policies. We disclose personally identifiable information about you as required or permitted by law, including complying with legal process (for example, we may disclose your information as necessary to comply with an authorized civil, criminal or regulatory investigation). We fully cooperate with law enforcement agencies in identifying those who use our services for illegal activities and may, in our sole discretion, disclose personal information or other information to satisfy any law, regulation, subpoena, or government request. We reserve the right to release personal information or other information about users who we believe are engaged in illegal activities or are otherwise in violation of our Terms of Use, even without a subpoena, warrant or court order, if we believe, in our sole discretion, that such disclosure is necessary or appropriate to operate our web site or to protect our rights or property, or that of our affiliates, or our officers, directors, employees, agents, third-party content providers, suppliers, sponsors, or licensors. We also reserve the right to report to law enforcement agencies any activities we reasonably believe in our sole discretion to be unlawful. If we are legally compelled to disclose information about you to a third party, we will attempt to notify you by sending an email to the email address in our records unless doing so would violate the

law or unless you have not provided your email address to us.

## **CHILDREN**

We do not knowingly allow individuals under the age 18 to create accounts that allow access to our Site.

## **CHANGES TO THIS PRIVACY POLICY**

We may amend our Privacy Policy in the future. In the event changes are made, we will be sure to post changes at the Site and at other places we deem appropriate.

## **QUESTIONS OR SUGGESTIONS**

If you have any questions or suggestions on ways we can improve our privacy policy with respect to personal information, please email us at [info@DoctorsTelemed.org](mailto:info@DoctorsTelemed.org).