

PRIVACY POLICY

Last revised: April, 2018

INTRODUCTION

Purpose. The purpose of this Privacy Policy is to describe how the Georgia Partnership for Telehealth (“GPT”) collects, uses and shares information about you through our online interfaces (e.g., websites and mobile applications) owned and controlled by us, including www.gptpathways.org (collectively referred to herein as the “Site”). Please read this notice carefully to understand what we do. If you do not understand any aspects of our Privacy Policy, please feel free to [Contact Us](#) or as described at the end of this Policy.

Our Privacy Policy explains:

INFORMATION THAT WE COLLECT

HOW WE USE AND SHARE YOUR INFORMATION

ACCESS TO YOUR INFORMATION AND CHOICES

SECURITY OF YOUR INFORMATION

CALIFORNIA PRIVACY RIGHTS

CONSENT TO PROCESSING OF PERSONAL DATA IN UNITED STATES

CHANGES TO OUR PRIVACY POLICY

QUESTIONS AND HOW TO CONTACT US

Scope; Third Party Sites. This Privacy Policy applies only to information we collect at and through the Site. Our Site also contains links to third party sites that are not owned or controlled by GPT. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every website that collects personal information.

Terms of Use. Please note that your use of our Site is also subject to our [Terms of Use](#).

INFORMATION THAT WE COLLECT

Information You Provide to Us

We collect information you provide to us, for example when you create or modify your account, register to use our Site, purchase products or services from us, request information from us, contact customer support, or otherwise communicate with us. This information may include your name, date of birth, medical history, health information and health insurance information.

Information Collected Through Cookies and Similar Technologies

We and our service providers use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our Site through your computer or mobile device. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the Site again, the cookie allows the Site to recognize your browser. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Site features or services may not function properly without cookies. We use cookies to improve the quality of our service, including for storing user preferences and tracking user trends.

No Information from Minors Under the Age of 18

The Site and Services are only for users of the age of 18 or older. If you are under the age of 18, please do not attempt to register with us at this Site or provide any personal information about yourself to us at any time. If you are under the age of 18 and wish to create an account with GPT (“Account”), your parent or legal guardian must create the Account, submit your personal information and agree to these Terms of Use on your behalf. If we learn that we have collected personal information from someone under the age of 18, we will promptly delete that information. If you believe we have collected personal information from someone under the age of 18, please [Contact Us](#).

HOW WE USE AND SHARE YOUR INFORMATION

To Provide Products, Services, and Information. We collect information from you in order to connect you to telehealth providers; register and service your online account; provide information that you request from us; contact you about your inquiries; send you promotional materials or advertisements about our products and services, as well as new features and offerings; and, administer surveys, sweepstakes, promotions and contests.

Sharing with Third Parties. We may provide information to third party service providers that help us operate and manage our Site, process orders, and fulfill and deliver products and services that you purchase from us. These service providers will have access to your personal information in order to provide these services, but when this occurs we implement reasonable contractual and technical protections to limit their use of that information to helping us provide the service.

Your Consent. In addition to the sharing described elsewhere in this Policy, we will share personal information with companies, organizations or individuals outside of GPT when we have your consent to do so.

Legal Proceedings. We will share personal information with third party companies, organizations or individuals outside of GPT if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, subpoena, legal process or enforceable governmental request.
- Enforce applicable Terms of Use, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of GPT, our users, customers or the public as required or permitted by law.

Transfer in the Event of Sale or Change of Control. If the ownership of all or substantially all of our business changes or we otherwise transfer assets relating to our business or the Site to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, we may transfer or sell your personal information to the new owner. In such a case, unless permitted otherwise by applicable law, your information would remain subject to the promises made in the applicable privacy policy unless you agree differently.

ACCESS TO YOUR INFORMATION AND CHOICES

If you have questions about personal information we have about you or need to update your information, you can [Contact Us](#). You can opt-out of receiving marketing and promotional emails from GPT by using the opt-out or unsubscribe feature contained in the emails. Please [Contact Us](#) if you would like to close your online account. If you close your account, we will no longer use your online account information or share it with third parties. We may, however, retain a copy of the information for archival purposes, and to avoid identity theft or fraud.

SECURITY OF YOUR INFORMATION

We use industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of your personal information. However, since the Internet is not a 100% secure environment, we cannot guarantee, ensure, or warrant the security of any information you transmit to us. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. It is your responsibility to protect the security of your login

information. Please note that emails and other communications you send to us through our Site are not encrypted, and we strongly advise you not to communicate any confidential information through these means.

CALIFORNIA PRIVACY RIGHTS

Under California's "Shine the Light" law, California residents who provide personal information in obtaining products or services for personal, family or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g. requests made in 2017 will receive information regarding 2016 sharing activities).

To obtain this information, please send an email message to legal@gpth.org with "Request for California Privacy Information" on the subject line and in the body of your message. We will provide the requested information to you at your email address in response. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

CONSENT TO PROCESSING OF PERSONAL DATA IN UNITED STATES

If you are a resident of the European Economic Area (EEA) or other jurisdiction outside of the U.S., in order to provide our Site, products and services to you, we may send and store your personal information (also commonly referred to as personal data) outside of the EEA, including to the United States. Accordingly, your personal information may be transferred outside of the country where you reside or are located, including to countries that may not or do not provide the same level of protection for your personal information. We are committed to protecting the privacy and confidentiality of personal information when it is transferred. Where such transfers occur, we take appropriate steps to provide the same level of protection for the processing carried out in any such countries as within the EEA to the extent feasible under applicable law. By using and accessing our Site, users who reside or are located in countries outside of the United States agree and consent to the transfer to and processing of personal information on servers located outside of the country where they reside, and that the protection of such information may be different than required under the laws of their residence or location.

CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your consent in accordance with applicable law. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

QUESTIONS AND HOW TO CONTACT US

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, please [Contact Us](#), email us at legal@gpth.org, or contact us by US postal mail at the following address:

Georgia Partnership for Telehealth
Post Office Box 1408
Waycross, GA 31502