



## Union Health Mobile Application Privacy Notice

Effective Date: 7/23/24

Union Health System, Inc. and its affiliates, including, Union Hospital, Inc. and Union Associated Physicians Clinic, LLC (collectively, “**Union Health**”) are committed to protecting the privacy of all individuals (“**you**” or “**your**”) who utilize the mobile application (as defined in the End User License Agreement, and hereinafter “**App**”). This statement explains how Union Health and our service providers (together, “**we**” or “**us**”) collect, use, and safeguard the information you may provide to us via the App.

### 1. WHAT INFORMATION DO WE COLLECT FROM YOU?

We may collect certain information related to your use of the App. We collect personal information and non-personal information (each as described below, and collectively referred to as “**information**” throughout this Privacy Notice). This information is accessed and collected in a variety of ways, including through the operating system of your mobile device and through information you submit through the App.

When we use the term “**personal information**” in this Privacy Notice, we mean information about you that is personally identifiable to you, including information that is considered “protected health information” under Federal law, if any. We collect the following personal information from you:

- Information you provide which may include your name, alias, postal address, email address, telephone number, insurance policy number, education, employment information, age, or sex/gender;
- Information about your precise geolocation, when you permit the App to access device location;
- User files stored on your device, e.g., calendar appointments, pictures, videos, or other file types you upload.

We also receive and store certain information automatically when you interact with us on the App. For example:

- The date and time use of the App started and stopped;
- The route taken while using the App;
- Your mobile device manufacturer, model, and operating system and version;
- Any errors detected while using the App;
- Any wi-fi signal observed (if using an Android device);
- The version of the App and map used;
- And any other information pertaining to your interaction with the App.

In order to collect the above information, we utilize certain tracking technologies, such as Bluetooth beacons, WiFi, and geomagnetic positioning.

## 2. HOW YOUR INFORMATION IS USED

We collect, retain, and use your personal information for the following purposes:

- To provide you the services and information you request;
- To operate and improve the App;
- To respond to an inquiry from you;
- To create aggregated, non-personal information, or to create de-identified information;
- To comply with applicable laws, regulations or legal process;
- To comply with requests of relevant regulatory and law enforcement and/or other governmental agencies or authorities;
- To enforce our End User License Agreement and/or to protect the rights, property, or safety of Union Health and other users of the App; and,
- To contact you through information you provide through the App, including any email address, telephone number, cell phone number, text message number, or fax number.

We may use any non-personal information for purposes permitted by and subject to applicable law, since non-personal information cannot identify you as an individual. For example, we may use non-personal information collected to monitor visitor traffic patterns and App usage and to improve the App. We may also use non-personal information in the aggregate to create summary statistics that help us analyze App usage trends, determine technical design specifications, arrange the App in a user-friendly way, and identify system performance or problem areas. We also use non-personal information to protect the security and integrity of the App.

## 3. WHEN WE SHARE YOUR PERSONAL INFORMATION

We share your information in the following circumstances:

- **Third Party Service Providers.** We may share your information with affiliated and unaffiliated companies that perform tasks on our behalf related to our business. Such tasks include analyzing usage data, fixing errors in the App, and protecting the security and integrity of the App. Third-party service providers receive your information as necessary to perform their role, and we instruct them not to use your information for any non-permitted purposes.
- **As Required by Law.** We will disclose your information as necessary or appropriate, including as required by law, regulation, subpoena, court order, legal process or government request; to enforce our End User License Agreement, including investigations of potential violations thereof; to detect, prevent or otherwise address fraud, security or technical issues; when we believe in good faith that disclosure is necessary to protect your safety or the safety of others; to protect our rights, to investigate fraud, or to respond to a government request.
- **Business Transfers.** If we purchase other businesses or their assets, sell our business assets, or are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, the information we obtain from you via the App may be disclosed to any potential or actual third-party purchasers of such assets and/or may be among those assets transferred in accordance with applicable law.
- **Health Care Providers:** We may share your information with healthcare providers involved in your care for treatment purposes.

All such recipients are bound by confidentiality agreements to protect your information. Except as provided above, we do not sell, rent, or lease your personal information to third parties for marketing purposes.

#### **4. YOUR PRIVACY CHOICES**

Union Health seeks to ensure all individuals are provided with the rights mandated by their governing jurisdiction. Not all of the rights discussed herein will apply to everyone and, depending upon where you are located, you may have choices about the personal information you disclose to us. If you are a resident of California, please see your rights in Section 10 of this Privacy Notice.

If you are a resident of Colorado, Connecticut, Montana, Oregon, Texas, Utah or Virginia, you may have the right to request that we:

- Provide you access to recorded personal information that you have previously provided to us
- Correct or amend inaccurate information we have about you
- Delete the collected information assuming that request does not conflict with our legal obligations or other legitimate business purposes for maintaining information

Union Health does not sell your personal information or share your information for targeted advertising or profiling.

Certain residents may also have the right to appeal our decision about the request. To exercise applicable rights, as described above, please submit a request to us by either:

- Calling us at 1-877-760-7533
- Emailing us at [privacy@union.health](mailto:privacy@union.health)

In some circumstances, we may ask for your assistance to help us respond to your request. If, for whatever reason, your request is denied, we will let you know why.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **5. CHILDREN**

The App prohibits children under the age of 13 to become users, and we do not intentionally collect information from children under the age of 13. By using the App, you represent that you are not under the age of 13. Any information we receive from users we believe to be under the age of 13 will be purged from our database. If you think that we have collected such information from a child under the age of 13 through this App please contact us.

#### **6. THIRD PARTY WEBSITES**

Union Health may reference or provide links to third-party websites or Union Health's other websites. You should review the privacy notices posted on such sites, as those privacy notices will control once you are directed to those websites. Please be aware that Union Health does not control, nor are we responsible for, the privacy notices or information practices of third parties or their websites.

#### **7. RETENTION**

We have policies and procedures relating to the retention of personal information based upon a classification scheme consisting of business functions and process areas, and the classification and types of data and records. We retain personal information for as long as we reasonably require it for business and legal purposes. In determining data retention periods, we consider contractual and legal obligations, and the expectations and requirements of customers, vendors, suppliers and others who disclose their

personal information with us. When we no longer need personal information, we securely delete or destroy it.

## 8. SECURITY

We employ security systems designed to protect the personal information we receive from you from unauthorized disclosure. We make commercially reasonable efforts to keep your personal information secure using appropriate technical, physical and organizational measures to prevent against unlawful use, alteration, unauthorized access accidental destruction and loss. No transmission of data over the internet is guaranteed to be completely secure. Due to the nature of the internet, we cannot guarantee that information, during transmission through the internet or while stored on its system or otherwise in its care, will be absolutely safe from intrusion by others, such as hackers. Because security is important to both Union Health and you, we will always make reasonable efforts to ensure the security of our systems, however, we are not liable for the illegal acts of third parties such as criminal hackers

## 9. UPDATES

We may update this Privacy Notice from time to time to reflect changes to our information practices. We will provide you with advance notice of a material change prior to your access of any portion of the App. For example, we may (i) require that you re-accept the updated version of this Privacy Notice, (ii) send you an electronic notification advising of the update to this Privacy Notice, or (iii) include a notice on the App. We do not ordinarily provide advance notice of a non-material change.

We encourage you to periodically review this page for the latest information on our privacy practices. You can tell when changes have been made to the Privacy Notice by referring to the “Effective Date” legend on top of this page.

## 10. CALIFORNIA RESIDENTS

This section supplements the information above and applies solely to California residents whose personal information is subject to California Consumer Privacy Act, as amended by the California Privacy Rights Act and its regulations (“CCPA”).

As of 7/23/24, Union Health launched its App. Since that time or in the past twelve (12) months, whichever period is shorter, we may have collected personal information described in Section 1 and shared this personal information with our service providers and third parties with which you have agreed we can share your information.

We do not share or disclose your personal information for commercial purposes without your separate consent, except for the reasons as described in Section 3.

We will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without providing notice to the California consumer, unless required or permitted by applicable laws.

### Your Rights Under the CCPA

Subject to certain exceptions, if you are a resident of California, you may have the following rights:

Privacy Right	Description
Notice	The right to be notified of what categories of personal information will be collected at or before the point of collection and the purposes for which they will be used and shared.

Access	<p>The right to request the categories of personal information that we collected in the previous twelve (12) months, the categories of sources from which the personal information was collected, the specific pieces of personal information we have collected about you, and the business purposes for which such personal information is collected and shared. You may also have the right to request the categories of personal information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your personal information.</p>
Data Portability	<p>The right to receive the personal information you have previously provided to us.</p>
Deletion	<p>The right to have your personal information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your personal information for one or more of the following categories of purposes: (1) to complete a transaction for which the personal information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your personal information internally, in a lawful manner that is compatible with the context in which you provided it, or for a purpose otherwise contemplated by Cal. Civ. Code Section 1798-105(c)-(d) and as amended.</p>
Correction	<p>You have the right to request that we correct any incorrect personal information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers that hold your data on our behalf to correct) your personal information from our records, unless an exception applies. We may deny your correction request if (a) we believe the personal information we maintain about you is accurate; (b) correcting the information would be impossible or involve disproportionate; or (c) if the request conflicts with our legal obligations.</p>
Automated Decision Making	<p>You have the right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out. Union Health does not currently engage in any automated decision-making practices.</p>
To Opt Out of Sales or Sharing of Personal Information	<p>Union Health does not sell your personal information or share your information for cross context behavioral advertising. We have not sold personal information in the past twelve (12) months, and we will not sell personal information that we collected without giving you an opportunity to opt-out and unless we first give you notice of our intent to sell and an express opportunity to opt-out of that sale. We do not knowingly sell the personal information of Consumers under 16. Because Union Health does not sell your personal information or share your personal information for cross-context behavioral advertising, we are not required to provide a Notice of Right to Opt-out of Sale/Sharing.</p>

Limit Use and Disclosure of Sensitive Personal Information	Union Health does not use or disclose sensitive personal information other than to provide our services to you. However, if we used or disclosed sensitive personal information for other purposes, you would have the right to opt out.
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### Exercising Your Rights

You may make a verifiable customer request for access or data portability twice within a 12-month period. To exercise the access, data portability, limit use, correction, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Mailing us your request
- Sending an email to Union Health at [privacy@union.health](mailto:privacy@union.health)
- Calling us at 1-877-760-7533

Only you or a person who is authorized to act on your behalf (“Authorized Agent”) may make a request related to your personal information. Requests may also be made on behalf of a minor child. Requests must:

- Provide sufficient information that allows Union Health to reasonably verify the requestor is the person about whom the Personal Information is collected or an Authorized Agent and
- Describe the request with sufficient detail that allows Union Health to properly understand, evaluate, and respond to it.
- Union Health cannot respond to requests or provide personal information if it is unable to verify a requestor’s identity or authority to make the request and confirm the personal information relates to the requestor. Making a request does not require you to create an account with Union Health. Personal information provided for identity verification for such requests will only be used to verify your identity or authority to make the request.
- **Identity Verification Requirements.** If we are unable to verify your identity or authority, we reserve the right to request additional information before we respond to your request. Union Health will match this information against information Union Health has previously collected about you to verify your identity. If an Authorized Agent is being utilized for a request, Union Health will require proof of the Authorized Agent’s authority. If we are unable to verify your identity, or we believe the request is fraudulent or may compromise the security of personal information, your request may be denied.
- Depending on the nature of the personal information which is the subject of your request, our verification process may include using existing authentication practices or matching two or three additional data points, and may also include submitting a declaration.
- **Response Timing and Format.** We’ll let you know that we received your request within ten (10) days of receipt and give you information regarding how we will process your request and will endeavor to provide a response to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.
- We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

- **Non-Discrimination.** Union Health will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not: (i) deny you products or services, (ii) charge you different process or rates for products or services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level of quality of products or services, or (iv) suggest that you receive different costs or rates for products or services or a different level of quality of products or services.
- **Appeals:** If you are not satisfied with the resolution of your request and would like to submit an appeal, please submit your appeal using the information provided above.

## 11. USERS FROM OUTSIDE THE UNITED STATES

This App is hosted in the United States and is governed by United States law. If you are using the App from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our (or our service provider's) servers are located. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using the App, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in this Privacy Notice.

## 12. CHANGES AND QUESTIONS REGARDING THIS PRIVACY NOTICE

We reserve the right to amend this Privacy Notice at our discretion and at any time. We encourage you to periodically review this Privacy Notice to be informed of how Union Health is protecting your information.

If you have any questions regarding this Privacy Notice, please contact Union Health at [privacy@union.health](mailto:privacy@union.health) or the following address and phone number:

Union Health  
Attn: Privacy Officer  
1606 N 7<sup>th</sup> Street  
Terre Haute, IN 47804  
Phone: (812) 238-7533