

## **PRIVACY POLICY**

### **INTRODUCTION**

The purpose of this Privacy Policy is to describe how Walker Group The Consultants, LLC d/b/a Telehealth Nursing & Wellness Care (“Telehealth Nursing & Wellness Care”) collects, uses and shares information about you through our website located at <https://www.telehealthnwcare.com> (the “Site”).

Telehealth Nursing & Wellness Care respects your privacy and is committed to protecting it as outlined in this Privacy Policy. If you do not agree with our policies and practices, you may not use our services. By accessing or using our services, you agree to this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of our services after we make changes is deemed acceptance of them.

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 as described at the end of this Policy.

Our Privacy Policy explains:

- Information That We Collect
- Purpose of Data Collection
- How We Use and Share Your Information
- Access to Your Information and Choices
- Security of Your Information
- Consent to Processing of Personal Data in United States
- Changes to Our Privacy Policy
- Questions and How 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 Telehealth Nursing & Wellness Care. 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.

**IMPORTANT NOTE:** This Privacy Policy applies to individually identifiable information that you provide to us for purposes of obtaining nursing care through the services (such information is also referred to as “Protected Health Information” or “PHI”), which is subject to our Health Insurance Portability and Accountability Act Notice of Privacy Practices (the “HIPAA Notice”), and information that is not PHI. The HIPAA Notice describes how we can use and share your PHI and also describes your rights with respect to your PHI. This Privacy Policy supplements

the HIPAA Notice for PHI. If there is ever any conflict between this Privacy Policy and the HIPAA Notice, the HIPAA Notice will take precedence. The HIPAA Notice does not apply to information that is not PHI.

## **INFORMATION THAT WE COLLECT**

### ***Information You Provide to Us.***

Telehealth Nursing & Wellness Care cares about privacy issues and wants you to be familiar with how we collect, use and disclose personally identifiable information you provide to us. We collect information you provide to us, for example when you create or modify your patient intake forms, create or modify your patient portal account, register to use our Site, purchase products or services from us, request information from us, contact customer support, or otherwise communicate with us or use our Site in commerce. This information may include:

- Name
- Address
- Email address
- Telephone number
- Payment information (credit card or debit card number, expiration date and credit card security code – solely for payment purposes)
- Date of Birth
- Username and password

Please note Telehealth Nursing & Wellness Care does not provide or intend to provide answers to health-related questions through the information generally available on the Site. Furthermore, if you sign up to use our services you may also be asked to submit certain confidential information during the sign-up / intake process, as well as demographic and other information relevant to diagnosis and treatment, such as lifestyle and general medical history (e.g. conditions, allergies etc.). You will have the opportunity to send confidential messages and communicate with nursing staff regarding your diagnosis and treatment. Telehealth Nursing & Wellness Care will keep these messages private and confidential as we adhere to industry-standard security practice to safeguard and protect your information and privacy.

## **Information We Collect Automatically Through Your Use of our Site**

### ***Google Analytics.***

We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) to collect certain information relating to your use of the Site. Google Analytics uses “cookies”, which are text files placed on your computer, to help the Site analyze how users use the site. You can find out more about how Google uses data by visiting “How Google uses data when you use our partners’ sites or apps”, (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)). We may also use Google Analytics Advertising Features or other advertising networks to provide you with interest-based advertising based on your online activity. For more information regarding Google Analytics please visit Google’s website, and pages that describe Google Analytics, such as [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html). To learn more about interest-based

advertisements and your opt-out rights and options, visit the [Digital Advertising Alliance](#) and the [Network Advertising Initiative](#) websites ([www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org)). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity.

***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, tracking user trends and providing relevant advertising to you. (See, “Advertising” below.)

***No Information from Individuals Under the Age of 18.***

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. If we learn that we have collected personal information from someone under 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 through the Contact page of our website or send us an email at [info@telehealthnwcare.com](mailto:info@telehealthnwcare.com).

***Purpose of Data Collection***

The collection, sharing and use of health information is fundamental to advancing healthcare and holds the promise of delivering higher quality care and better health outcomes at lower overall cost. Telehealth Nursing & Wellness Care safely, securely and strategically collects health data and demographics for our use only. Where possible, we de-identify health data to comply with existing and evolving regulatory and payment policies and regulations that set forth stringent patient safety, effectiveness and outcomes-based requirements.

The use of personal health data and de-identified health data in the medical technology field supports health and wellness; aids in the development of diagnostics, treatments and cures; improves health care interventions and outcomes; enables research; drives technology innovation; and enhances the quality and efficiency of health care delivery. This includes the use of SMS communications, providing targeted content or offers, or improving user experience.

**HOW WE USE AND SHARE YOUR INFORMATION**

***To Provide Products, Services, and Information.***

We collect information from you and use the information to:

- Provide services that you order using the Site;
- Register and service your online account;
- Provide information that you request from us;
- Contact you about our services or information you requested;
- Process credit card and debit card transactions;

- Allow you to participate in interactive features of our services;
- Send you promotional materials or advertisements about our products and services, as well as new features and offerings;
- Enforce our Terms of Use or other legal rights and remedies;
- Administer surveys, sweepstakes, promotions and contests;
- Provide interest-based targeted advertising to you; and,
- Any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

### ***Sharing with Third Parties***

#### **Healthcare Providers.**

We share your personal information with various healthcare affiliates, doctors and relevant medical staff in connection with your diagnosis and treatment.

#### **Vendors and Services Providers.**

We may provide information to third-party vendors and service providers that help us operate and manage our Site, process orders, and fulfill and deliver products and services that you purchase or request from us. These vendors and 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. We do not share your email, phone number, demographics, or any other protected health information with third parties for marketing purposes.

#### **SMS Program/Service.**

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. By submitting your phone number, you are authorizing us to send you text messages and notifications. Message/data rates apply. Reply STOP to unsubscribe to a message sent from us.

#### **Corporate Affiliates.**

We may share your personal information with our corporate affiliates which are subject to this policy and applicable law.

#### **Advertising.**

We may use how you browse and shop in order to show you ads for Telehealth Nursing & Wellness Care or our advertising partners that are more relevant to your interests. We may use cookies and other information to provide relevant interest-based advertising to you. Interest-based ads are ads presented to you based on your browsing behavior in order to provide you with ads more tailored to your interests. These interest-based ads may be presented to you while you are browsing our site or third-party sites not owned by Telehealth Nursing & Wellness Care.

We belong to ad networks that may use your browsing activity across participating websites to show you interest-based advertisements on those websites. Currently, our Site does not recognize if your browser sends a “do not track” signal or similar mechanism to indicate you do

not wish to be tracked or receive interest-based ads. To learn more about interest-based advertisements and your opt-out rights and options, visit the [Digital Advertising Alliance](#) and the [Network Advertising Initiative](#) websites ([www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org)). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity.

#### **Social Media.**

If you use third-party services, such as Facebook, Google, or Twitter, through the Site, to login to the Site, or to share information about your experience on the Site with others, these third-party services may be able to collect information about you, including information about your activity on the Site, and they may notify your connections on the third-party services about your use of the Site, in accordance with their own privacy policies.

#### **Public Posts and Activities.**

If you choose to engage in public activities on the Site, you should be aware that any information you share there can be read, collected, or used by other users of these areas. You should use caution in disclosing personal information while participating in these areas. We are not responsible for the information you choose to submit in these public areas. Any user posting in these public areas understands and acknowledges that there is no expectation of privacy for the information in these public areas.

We use measures to protect PHI from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction in accordance with HIPAA. We use measures designed to protect other information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. ***However, you should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure and is subject to hacking, viruses, bugs, malware, and ransomware.***

#### **Your Consent.**

In addition to the sharing described elsewhere in this Policy, we will share personal information with companies, organizations or individuals outside of Telehealth Nursing & Wellness Care when we have your consent to do so.

#### **Legal Proceedings.**

We will share personal information with third-party companies, organizations or individuals outside of Telehealth Nursing & Wellness Care 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 Telehealth Nursing & Wellness Care, 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**

You can access and update certain information we have relating to your online account, or patient portal, by signing into your account and going to the Account section. If you have questions about personal information we have about you or need to update your information, you can Contact Us via the Contact page of our website or email us at [info@telehealthnwcare.com](mailto:info@telehealthnwcare.com).

### **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.

### **CONSENT TO PROCESSING OF PERSONAL DATA IN UNITED STATES**

This Site is intended for use only by residents of the U.S. If you are a citizen of the European Economic Area (EEA) or other jurisdiction outside of the U.S., please note that in order to provide our Site's 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.

### **AUTHORIZATION NOT REQUIRED FOR USE AND/OR DISCLOSURE OF PHI**

The following is a list of the types of uses and/or disclosures, which do not require consent, authorization or the opportunity to opt out.

1. **Disclosure required by law:**  
PHI may be used or disclosed if and to the extent required by law.
2. **Public health activities:**  
PHI may be used or disclosed to a public health authority that is authorized by law to collect or receive such information for preventing or controlling disease, injury or disability, including public health issues, vital records, child or adult abuse or neglect; adverse food or drug events, and investigations of work-related illnesses or injuries as required under law.
3. **Victims of abuse, neglect, or domestic violence:**  
PHI may be used or disclosed to a government authority, including a social service or protected service agency, which is investigating a report of abuse, neglect or domestic violence to the extent the disclosure is required or permitted by law.
4. **Health oversight activities:**  
With certain exceptions, PHI may be used or disclosed to a health oversight agency for oversight activities authorized by law, including audits, civil, administrative or criminal investigations or proceedings, inspections, licensure or disciplinary actions, or other activities for oversight of the University or other government benefit or regulatory programs (i.e. JCAHO).
5. **Judicial and Administrative Proceedings:**  
PHI may be disclosed in the course of a judicial or administrative proceeding in response to an order of a court or administrative tribunal, or a HIPAA compliant subpoena, discovery request or other lawful process.
6. **Law Enforcement Purposes:**  
PHI may be disclosed for law enforcement purposes to comply with laws that require the reporting of certain types of wounds or physical injuries.
7. **Decedents:**  
PHI regarding decedents may be disclosed to coroners, medical examiners and funeral directors if necessary to carry out the duties of their positions.
8. **Threats to Health or Safety:**  
PHI may be used or disclosed under certain circumstances to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public.
9. **Specialized Government Functions:**  
PHI may be used or disclosed for specialized government functions such as military and veterans activities, security and intelligence activities, protective services for officials, medical suitability, and to correctional institutions.
10. **Workers' Compensation:**  
PHI may be used or disclosed to the extent required to comply with worker's compensation and similar programs.

## **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 may 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 email us at [info@telehealthnwcare.com](mailto:info@telehealthnwcare.com) or contact us by US postal mail at the following address: P.O. Box 13746 Durham, NC 27709.