#### **Columbus Ortho Website Privacy Policy**

This Privacy Policy will tell you what information Columbus Orthopaedic Clinic, PA and Columbus Orthopaedic Outpatient Center (the "Company," "we," "our," or "us")collects, how it is used and what your choices are. By using the Columbus Orthopaedic Clinic, PA and Columbus Orthopaedic Outpatient Center Website (columbusortho.com) (the "Website"), you agree to acceptance of this Website Privacy Policy. Please read the following carefully before using the Website. If you do not agree with our policies and practices, your choice is not to use this Website. By accessing or using this Website, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates.

Our Website is targeted to, and intended for access only by users in the United States of America.

### Information Collection and Use

#### Information We Collect

- <u>IP Addresses</u> We collect and log the IP address of all visitors to the Website. An IP address is a number automatically assigned to your computer whenever you access the Internet. IP addresses allow computers and servers to recognize and communicate with one another. We collect IP address information so that we can properly manage our system and gather information about how our site is being used. This includes the pages visitors are viewing. Your IP address may be associated with records containing personal information.
- <u>Personal information</u> "Personal Information" includes information that is unique to an individual, such as a name, address, job title, email address or telephone number. If you submit to the Company any Personal Information relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy. By submitting personal information, you grant the Company and any affiliates of the Company the right to transmit, monitor, retrieve, store and use your information in connection with the operation of the website.

### **Sensitive Information**

"Sensitive Information" is information that meets the definition of Personal Information and also concerns specific health conditions or treatments that a certain identifiable person has, or information which could be used to impersonate someone, such as a social security number, financial account data, government identification information, or other data used for individual authentication.

We do not collect Sensitive Information except in limited circumstances where it is necessary for business purposes. You agree not to submit Sensitive Information on this website except as requested by the Company. The Company will only request Sensitive Information as required to complete a transaction or identify you individually for registration, certification, or other mutually beneficial business purposes. The Company will endeavor to protect your Sensitive Information and will never sell it or give it to a third party for their use. Your Sensitive Information will be retained only as required for business and recordkeeping purposes. Sensitive Information will be destroyed when it is no longer reasonably needed in our judgment.

#### Children

Our Website is not intended for children under eighteen (18) years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or through any of its features, register on the Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at kbeasley@columbusortho.com.

## How We Use This Information

The Company uses the information you provide to fulfill online requests, process credit card information and respond to customer service inquiries, or in other ways as required by law.

We may use your information:

- To provide you with Website login information (if applicable)
- To help us improve the services we offer

- To personalize your experience and inform you about the treatments/services in which you have indicated an interest
- To tailor digital advertisements on third-party sites based on your interactions on our site
- To improve our Website offerings and send you information and updates
- To respond to your questions and requests and improve customer service
- To administer a promotion, survey or other site feature
- To communicate changes to our Privacy Policy or terms of use

Only those who need the information provided to perform a specific task have access to your information. These are authorized members of the Company's workforce, who are required to attend training on patient privacy and confidentiality. In some cases, third parties contracted by the Company may have access to your information to perform a specific task, for example, to send you an e-newsletter.

We may also disclose Personal Information (a) with your consent; (b) to comply with any court order, law, or legal process, including to respond to any government or regulatory request; (c) to enforce or apply our Website Terms of Use, found at [TERMS OF USE URL], and other agreements; or (d) if we believe disclosure is necessary or appropriate to protect the rights property, or safety of us, our clients, or others.

## Data Security

The Company makes every reasonable effort to ensure that your Personal Information remains as secure as possible. Accordingly, we prevent unauthorized access by a secure firewall and use of security technologies to protect the integrity and privacy of any Personal Information you provide.

As an additional security measure, your Personal Information is also encrypted during transmission by 128-bit encryption software. (Encryption is a common method used to protect transmission of sensitive data across the Internet.) This is an industry standard.

Although we endeavor to protect your Personal Information, the Company cannot warrant the security of any information you transmit to us through online applications, and you do so at your own risk. We are not responsible for circumvention of any privacy setting or security measures contained on the Website. Depending on the nature of the inquiry, your communication could be discarded or archived. If you wish, you can contact us instead by telephone at the numbers provided throughout our site.

The safety and security of your information also depends on you. If you have chosen or been provided a password for access to certain parts of our Website, you are responsible for keeping this password confidential. Do not share your password with any other person or entity.

## Online Forms

Forms provided on the Website may include event registration, newsletter signups, appointment requests and referral requests. The information required to complete the transaction is noted on each specific form. Although we provide robust security measures to protect the transmission of information, the Company is not responsible if unauthorized parties gain access to the confidential information shared in the online forms.

#### **Email Information**

Occasionally, we will request Personal Information from you in order to deliver materials you have requested, respond to your questions or provide information. The Company keeps Personal Information on file, but does not share, sell, license or transmit this information to third parties or external vendors unless required to do so by legal, judicial or governmental proceedings, or in order to provide the services requested. Please note that email is considered a nonencrypted (and therefore nonsecure) form of communication, and it can be accessed and viewed by others without your knowledge and permission. For that reason, to protect your privacy, please do not use email to communicate information that you consider confidential.

# Cookies, Tracking and Interest-based Advertising

The Website uses "cookies", tracking pixels and related technologies. Cookies are small data files that a website can transfer to your computer. Examples of information we collect include how often someone visits our site and what they do while on our site. We use this information in the aggregate to understand how our visitors as a group use different resources and to help us improve our Website. We also collect information about the activity of individual Website users. This information may be used to target related Columbus Orthopaedic Clinic, PA and Columbus Orthopaedic Outpatient Center advertisements to you on other third-party sites.

Most Internet browsers automatically accept cookies, but you can set your browser to refuse them or to alert you when they are being sent. You can access the information on the Website without enabling cookies in your browser.

You can opt out of receiving all interest-based advertisements on the Digital Advertising Alliance (DAA) website: http://www.aboutads.info/choices. Please note that if you delete your cookies or upgrade your browser after having opted out, you will need to opt out again. Further, if you use multiple browsers or devices you will need to execute this opt out on each browser or device.

# Third-Party Vendors/Content Providers

The Company never shares any personal information you provide when requesting information with third parties, except as required by law or in order to provide the services requested. The Company occasionally will engage reputable third-party vendors to help us manage our Website, provide content and information, and interact better with our patients and visitors. For example, we may use third party analytics and advertising services to analyze information regarding visits to our Website.

The Website currently uses Google Analytics to collect information about the use of the Website. Analytics collects information from users such as age, gender, interests, demographics, how often they visit the Website, what pages they visit, and what other websites they have used before coming to the Website. We use the information we get from Google Analytics to analyze traffic, remarket our products and services to users, improve our marketing, advertising, and to improve the Website. We have enabled Google Analytics advertising features such as remarketing with Google Analytics, Google Display Network Impression Reporting, and Google Analytics Demographics and Interest Reporting. Google Analytics collects only the IP address assigned to you on the date you visit the Website, not your name or other identifying information. Google also uses specific identifiers to help collect information about the use of the Website. For more information on how Google collects and processes your data, visit https://www.google.com/policies/privacy/partners/. You can prevent Google Analytics from using your information by opting out at this link: https://tools.google.com/dlpage/gaoptout.

# Login/Passwords

Some sections of the Website may require login identifiers and/or passwords. You are responsible for taking reasonable steps to ensure that no unauthorized person has access to your password or account login information. It is your sole responsibility to control the use of login information and passwords, to authorize, monitor and control access to and use of your Website account and password and to inform the Website promptly of any need to deactivate a password.

#### Links to External Websites

This Website Privacy Policy applies only to the Columbus Orthopaedic Clinic, PA and Columbus Orthopaedic Outpatient Center Website. In order to provide Website users with other helpful information, the Website contains links to other websites. However, the Company provides no authority over external organizations' websites and this Privacy Policy does not apply to external sites that are provided as links. We encourage you to read the Privacy Policies on any external websites before providing them with personal information.

# Changes to This Policy

The Company has the right to change or update this Website Privacy Policy from time to time without notice, so please review it periodically to keep informed of any changes. Any changes will apply to all information we have about you. If you have questions about this Privacy Policy or concerns about how we collect, use or protect your Personal Information, please contact us at <a href="mailto:administration@columbusortho.com">administration@columbusortho.com</a>. The new notice will be available upon request, in our office, and on our Website.

For more information see: www.hhs.gov/ocr/privacy/hippa/understanding/consumers/noticepp.html.

### This Notice of Privacy Practices applies to the following organizations.

Columbus Orthopaedic Clinic, PA

Columbus Orthopaedic Outpatient Center

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