NOTICE OF PRIVACY POLICY
Effective December 2014

CYPRESS HEALTHCARE

THIS NOTICE DEScribes HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.

PLEASE READ IT CAREFULLY.

The following is the privacy policy (“Privacy Policy”) of Cypress Healthcare (“Covered Entity”) as described in the Health Insurance Portability and Accountability Act of 1996 and regulations promulgated thereunder, commonly known as HIPAA. Cypress Healthcare includes all of the following entities and their respective facilities: Acton Quick Care, Alabama Pain Physicians, Alabama Vascular and Lymphatic Specialists, National Pain Custom Pharmacy, and Renew Clinic. All of these entities follow the terms of this notice. HIPAA requires Covered Entity by law to maintain the privacy of your personal health information and to provide you with notice of Covered Entity’s legal duties and privacy policies with respect to your personal health information. We are required by law to abide by the terms of this Privacy Notice.

Your Personal Health Information

We collect personal health information from you through treatment, payment, and related healthcare operations, the application and enrollment process, and/or healthcare providers or health plans, or through other means, as applicable. Your personal health information is protected by law that could be used to identify you as the individual patient who is associated with that health information. We are required to notify you of any breach of your unsecured protected health information.

Uses or Disclosures of Your Personal Health Information

Generally, we may not use or disclose your personal health information without your permission. Further, once your permission has been obtained, we must use or disclose your personal health information in accordance with the specific terms that permission. The following are the circumstances under which we are permitted by law to use or disclose your personal health information.

Without Your Consent

Examples of payment activities include: (A) billing and collection activities and related data processing; (B) actions by a health plan or insurer to obtain premiums or to determine or fulfill its responsibilities for coverage and provision of benefits under its health plan or insurance agreement, determinations of eligibility or coverage, adjudication or subrogation of health benefit claims; (C) medical necessity and appropriateness of care reviews, utilization review activities; and (D) disclosure to consumer reporting agencies of information relating to collection of premiums or reimbursement.

Examples of health care operations include: (A) development of clinical guidelines; (B) contacting patients with information about treatment alternatives or communications in connection with case management or care coordination; (C) reviewing the qualifications of and training health care professionals; (D) underwriting and premium rating; (E) medical review, legal services, and auditing functions; and (F) general administrative activities such as customer service and data analysis.

As Required By Law

Examples of treatment activities include: (A) the provision, coordination, or management of health care and related services by health care providers; (B) consultation between health care providers relating to a patient; or (C) the referral of a patient for health care from one health care provider to another.

We may use or disclose your personal health information to the extent that such use or disclosure is required by law and the use or disclosure complies with and is limited to the relevant requirements of such law. Examples of instances in which we are required to disclose your personal health information include: (A) public health activities including, preventing or controlling disease or other injury, public health surveillance or investigations, reporting adverse events with respect to food or dietary supplements or product defects or problems to the Food and Drug Administration, medical surveillance of the workplace or to evaluate whether the individual has a work-related illness or injury in order to comply with Federal or state law; (B) disclosures regarding victims of abuse, neglect, or domestic violence including, reporting to social service or protective services agencies; (C) health oversight activities including, audits, civil, administrative, or criminal investigations, inspections, licensure or disciplinary actions, or civil, administrative, or criminal proceedings or actions, or other activities necessary for appropriate oversight of government benefit programs; (D) judicial and administrative proceedings in response to an order of a court or administrative tribunal, a warrant, subpoena, discovery request, or other lawful process; (E) law enforcement purposes for the purpose of identifying or locating a suspect, fugitive, material witness, or missing person, or reporting crimes in emergencies, or reporting a death; (F) disclosures about decedents for purposes of cadaveric donation of organs, eyes or tissue; (G) for research purposes under certain
Under HIPAA, you have certain rights with respect to your personal health information. The following is a brief overview of your rights and our duties with respect to enforcing those rights.

**Your Rights With Respect to Your Personal Health Information**

**Right To Request Restrictions On Use Or Disclosure**

You have the right to request restrictions on certain uses and disclosures of your personal health information about yourself. You may request restrictions on the following uses or disclosures: (A) to carry out treatment, payment, or healthcare operations; (B) disclosures to family members, relatives, or close personal friends of personal health information directly relevant to your care or payment related to your health care, or your location, general condition, or death; (C) instances in which you are not present or your permission cannot practically be obtained due to your incapacity or an emergency circumstance; (D) permitting other persons to act on your behalf to pick up filled prescriptions, medical supplies, X-rays, or other similar forms of personal health information; or (E) disclosure to a public or private entity authorized by law or by its charter to assist in disaster relief efforts.

While we are not required to agree to any requested restriction, if we agree to a restriction, we are bound not to use or disclose your personal health information, except as described in the restriction. You have the right to request that we not disclose your protected health information to family members, relatives, or close personal friends of personal health information directly relevant to your care or payment related to your health care, or your location, general condition, or death; and (C) to whom the limits should apply. If such a request is made, we must accommodate reasonable requests by you to receive communications of personal health information from us by alternate means or at alternate locations if you clearly state that the disclosure of all or part of that information could endanger you.

**Right To Inspect And Copy Your Personal Health Information**

Your designated record set is a group of records we maintain that includes Medical records and billing records about you, or enrollment, payment, claims adjudication, and case or medical management records systems, as applicable. You have the right of access in order to inspect and obtain a copy of your personal health information contained in your designated record set, except for (A) psychotherapy notes; (B) information compiled in reasonable anticipation of, or for use in, a civil, criminal, or administrative action or proceeding, and (C) health information maintained by us to the extent to which the provision of access to you would be prohibited by law.

We require written requests. We must provide you with access to your personal health information in the form or format requested by you, if it is readily producible in such form or format, or, if not, in a readable hard copy form or such other form or format. We may provide you with a summary of the personal health information requested, in lieu of providing access to the personal health information or may provide an explanation of the personal health information to which access has been provided, if you agree in advance to such a summary or explanation and agree to the fees imposed for such summary or explanation. We will provide you with access as requested in a timely manner, including arranging with you a convenient time and place to inspect or obtain copies of your personal health information or mailing a copy of it to you at your request. We will discuss the scope, format, and other aspects of your request for access as necessary to facilitate timely access. If you request a copy of your personal health information or agree to a summary or explanation of such information, we may charge a reasonable cost-based fee for copying, postage, if you request a mailing, and the costs of preparing an explanation or summary as agreed upon in advance. We reserve the right to deny you access to and copies of certain personal health information as permitted or required by law. We will reasonably attempt to accommodate any request for personal health information by, to the extent possible, giving you access to other personal health information after excluding the information as to which we have a ground to deny access. Upon denial of a request for access or request for information, we will provide you with a written denial specifying the legal basis for denial, a statement of your rights, and a description of how you may file a complaint with us. If we do not maintain the information that is the subject of your request for access but we know where the requested information is maintained, we will inform you of where to direct your request for access.

**Right To Amend Your Personal Health Information**

You have the right to request that we amend your personal health information or a record about you contained in your designated record set, for as long as the designated record set is maintained by us. We have the right to deny your request for amendment, if (A) we determine that the information or record that is the subject of the request was not created by
Beginning April 14, 2003, you have the right to receive a written accounting of all disclosures of your personal health information that we have made within the six (6) year period immediately preceding the date on which the accounting is requested. You may request an accounting of disclosures for a period of time less than six (6) years from the date of the request. Such disclosures will include the date of each disclosure, the name and, if known, the address of the entity or person who received the information, a brief description of the information disclosed, and a brief statement of the purpose and basis of the disclosure or, in lieu of such statement, a copy of your written authorization or written request for disclosure pertaining to such information. We are not required to provide accountings of disclosures for the following purposes: (A) treatment, payment, and healthcare operations, (B) disclosures pursuant to your authorization, (C) disclosures to you, (D) for a facility directory or to persons involved in your care, (E) for national security or intelligence purposes, (F) to correctional institutions, and (G) with respect to disclosures occurring prior to 4/14/03. We reserve our right to temporarily suspend your right to receive an accounting of disclosures to health oversight agencies or law enforcement officials, as required by law.

We will provide the first accounting to you in any twelve (12) month period without charge, but will impose a reasonable cost-based fee for responding to each subsequent request for accounting within that same twelve (12) month period. All requests for an accounting shall be sent to Cypress Healthcare, LLC, 2868 Acton Road, Vestavia Hills, Alabama 35243.

You have the right to obtain a paper copy of this Privacy Policy from us upon your written request, even if you have agreed to receive the Privacy Policy electronically. For any other requests or for further information regarding the privacy of your personal health information, and for information regarding the filing of a complaint with us, please contact our Privacy Officer at the address, telephone number, or e-mail address listed above.

Complaints
You may file a complaint with us and with the Secretary of DHHS if you believe that your privacy rights have been violated. You may submit your complaint in writing by mail or electronically to our Privacy Officer at 205-332-3160 or privacyofficer@cypresshc.com. A complaint must name the entity that is the subject of the complaint and describe the acts or omissions believed to be in violation of the applicable requirements of HIPAA or this Privacy Policy. A complaint must be received by us or filed with the Secretary of DHHS within 180 days of when you knew or should have known that the act or omission complained of occurred. You will not be retaliated against for filing any complaint.

Amendments to this Privacy Policy
We reserve the right to revise or amend this Privacy Policy at any time. These revisions or amendments may be made effective for all personal health information we maintain even if created or received prior to the effective date of the revision or amendment. We will provide you with notice of any revisions or amendments to this Privacy Policy, or changes in the law affecting this Privacy Notice, by mail or electronically within 60 days of the effective date of such revision, amendment, or change.

On-going Access to Privacy Policy
We will provide you with a copy of the most recent version of this Privacy Policy at any time upon your written request sent to Cypress Healthcare, LLC or at the following email address: privacyofficer@cypresshc.com. You have the right to obtain a paper copy of this Privacy Policy from us upon your written request, even if you have agreed to receive the Privacy Policy electronically. For any other requests or for further information regarding the privacy of your personal health information, and for information regarding the filing of a complaint with us, please contact our Privacy Officer at the address, telephone number, or e-mail address listed above.