## CHPW VIRTUAL CARE PRIVACY POLICY

This policy is generally applicable to Community Health Plan of Washington's ("CHPW" or "we" or "our") collection and use of information about users of CHPW Virtual Care, whether accessed through the website at www.chpwvirtualcare.org or the mobile application. For information about Community Health Plan of Washington's privacy policies with respect to your personal health information, please see our Notice of Privacy Practices for Apple Health and Medicare Advantage. If you are a CHNW Cascade Select member, please refer to Community Health Network of Washington's Notice of Privacy Practices, available [here].

BY USING ANY PART OF CHPW VIRTUAL CARE, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT ACCEPT THIS PRIVACY POLICY, PLEASE DO NOT USE CHPW VIRTUAL CARE.

**Scope:** CHPW is committed to protecting the privacy and security of the users of CHPW Virtual Care. This Privacy Policy tells you about how we collect, use, and share your personal information, and the choices you have about how we use that information. Please read this Privacy Policy carefully.

CHPW Virtual Care may contain links to websites that are not controlled by CHPW. Those websites are not governed by this privacy policy. How those websites collect and use your information will be explained in the privacy policies of those other sites.

**Personally identifiable information**: CHPW Virtual Care requests some identifying information from you in order to provide you with appropriate services and to customize your experience. To use CHPW Virtual Care, you are required complete a questionnaire that asks for detailed medical information needed to diagnose and treat your condition. It is very important that you answer the questions completely and honestly and do not leave out any information. CHPW Virtual Care providers use the information you provide about your condition to provide services to you. CHPW Virtual Care allows you to review and change some of your personal information on demand through your profile.

We may also request personally identifiable information from you in connection with visit satisfaction surveys. We may also collect additional information to comply with state or federal regulations regarding the disclosure of personally identifiable health information.

In all of these cases, we will collect personally identifiable information from you only if you voluntarily submit such information to us. We will not disclose any personally identifiable information, such as your full name, street address, telephone number, credit card number, or e-mail address, to any third party, except under the following circumstances:

- We may use or disclose individually identifiable health information as described in our Notice of Privacy Practices.
- We may disclose personally identifiable information to our trusted business partners who have agreed to abide by this privacy policy.
- We will release specific information about you or your account to comply with any valid legal process such as a search warrant, subpoena, statute, or court order.
- We may also release specific information to protect our rights or the safety and rights of other users, such as if there is an attempted breach of the security of the CHPW Virtual Care site or a physical threat to you or others.

If you identify yourself to us by sending us e-mail with questions or comments, we may use your personal information to respond to your questions or comments. We may file your comments for future reference, or we may discard the information after we have reviewed it. We may also use the information you provide to us to improve the CHPW Virtual Care experience.

**Non-personally identifiable information and the use of cookie technology**: We collect nonpersonally identifiable information through the use of "cookie" technology and/or IP address tracking. Non-personally identifiable information might include the browser you use, the type of computer, smartphone, or other device you are using, your operating system, your Internet service provider, and other similar information. Your member ID number or profile information is not stored in cookies.

We use such information in the aggregate to understand how our users, as a group, use the services and resources provided on our site. When we say we use the information in the aggregate, that means that information from a group of individuals has been compiled and processed so that no one individual's information can be isolated. We study aggregate information to learn which areas of CHPW Virtual Care are most popular, which areas need improvement, and what technologies are being used so that we may improve CHPW Virtual Care.

Most Web browsers are set to accept cookies. You can set your browser to refuse cookies, or to alert you when cookies are being sent. If you do so, please note that some features of CHPW Virtual Care may not function properly.

**Security policy**: Protecting your privacy and your information is a top priority. We have taken careful measures to secure both your information and our physical premises. We use tools to secure the information sent from your personal computer, smartphone, or other device to our servers. Our secure server software encrypts information, ensuring that all Internet transactions with CHPW Virtual Care remain private. Information sent outside of the CHPW Virtual Care website or mobile application may not be protected in the same way.

You also must take steps to ensure the security of your personal information. It is your responsibility to keep your password or other log-in information safe and private, and to make

sure no one else uses your information to access CHPW Virtual Care. We cannot protect your personal computer or other device from unauthorized access, and our systems cannot tell whether the person entering your login and password is really you.

We recommend that you not use CHPW Virtual Care on a public computer, such as a computer provided at a public library. If you do access CHPW Virtual Care using a public or shared computer, always log out of the password-protected portions of the site when you are finished. You also should not leave your computer or smartphone unlocked or unattended while you are signed on to the site.

If you access CHPW Virtual Care using your employer's computer network, you should review your employer's policy on Internet usage and/or confidentiality and security policy. Although we have taken strong measures to ensure the privacy of your personal information, we cannot control the monitoring activities that may be conducted by your employer.

**Changes:** We may, from time to time, make changes to this Privacy Policy. Changes to the Privacy Policy will be posted on this page. By continuing to use CHPW Virtual Care after we post changes to this Privacy Policy, you will be agreeing to those changes.