

## **Privacy Policy**

### **Neda Skin Solutions Privacy Statement**

Neda Skin Solutions provides a website “<https://nedermatology.com/>” (the “Website”)

The Website allows our members and other users to view health-related information, communicate with our practitioners and staff, arrange for clinical and health plan services, and access additional services.

This Privacy Statement applies to the Website which is owned and operated by Neda Skin Solutions. This Privacy Statement describes how Neda Skin Solutions collects and uses the personal information you provide on, and other information that is collected from your use of the Website. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

All your protected health information maintained by Neda Skin Solutions including information you provide on the Website, is also subject to the Notices of Privacy Practices issued by Neda Skin Solutions under the Health Insurance Portability and Accountability Act (“HIPAA”). The Notices of Privacy Practices may contain additional provisions relating to the use and disclosure of your information that go beyond the terms of this Privacy Statement.

Neda Skin Solutions is committed to protecting the privacy of the users of the Website. We will use and disclose your personal information as stated in this Privacy Statement.

#### **Privacy Statement**

Use and disclosure of health information includes using the information to provide treatment to the individual, to make payments for such treatment, and to conduct ongoing quality improvement activities. Our use and disclosure of an individual’s personal information (including health information) is limited as required by state and federal law. We will not give, sell, rent, share, or trade any of your personal information with any third party except as outlined in this Policy or without your consent.

#### **Security**

The Website has security measures in place that are intended to help protect against the loss, misuse, unauthorized access, or alteration of information under our control. These measures include encrypted connection, HIPAA compliance, and SSL (Secure Sockets Layer ). Despite these measures, the confidentiality of any communication or material transmitted to or from us via the Website by internet, text message or email cannot be guaranteed. At your discretion, you may contact us at the mailing address or telephone number listed in the “Questions, Complaints, and Contacts” section at the end of this Privacy Statement.

#### **Revisions to the Privacy Statement**

We may revise this Privacy Statement from time to time as we add new features or modify the way in which we manage information, or as laws change that may affect our services. If we make material changes to our Privacy Statement, we will post notice of this on our website prior to the changes

becoming effective. Any revised Privacy Statement will apply both to information we already have about you at the time of the change, and any personal information created or received after the change takes effect. We include a version number on this Privacy Statement consisting of the date (year, month, and day) it was last revised. We encourage you to periodically reread this Privacy Statement, to see if there have been any changes to our policies that may affect you.

### **Collecting, Using and Disclosing Personal Information**

Except as disclosed in this Privacy Statement and the Terms of Use <https://DOMAIN.com/privacy-policy>, we do not collect any personally identifiable information about visitors to the Website. The policies, sources, uses and disclosures of information are outlined in Sections 1 through 14 that follow:

#### Information Collection

(a) We may collect the following personal information from you:

- contact information such as name, email address, mailing address, and phone number
- age or date of birth
- unique identifiers such as username, account number, and password
- preferences information such as preferred first name and the types of emails you'd like to receive from us
- health or medical information
- credit card information
- medical record number or health record number

(b) Information We Collect Automatically When You Use the Services. When you access or use the Services, we automatically collect information about you, including:

- **Log Information:** We log information about your use of the Services, including but not limited to the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that help us to improve our Services and your experience, see which areas and features of our Services are popular and count visits. We may also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see "Preferences" below.

(c) Information We Collect from Other Sources. We may also obtain information from other sources and combine that with information we collect through our Services. For example, we may collect information about you from third parties, including but not limited to identity verification services, credit bureaus, mailing list providers and publicly available sources, and if you Client or log into your account through a

social media site, we will have access to certain information from that site, such as your name, account information and friends lists, in accordance with the authorization procedures determined by such social media site.

2. Use of Information. We may use information about you for various purposes, including to:

- schedule appointments with our providers
- send you requested product or service information
- respond to customer service requests
- administer your account
- send you newsletters, text messages or email communications
- send you marketing communications
- respond to your questions and concerns
- improve our website and marketing efforts
- conduct internal quality improvement or business analysis
- carry out any other purpose for which the information was collected

### **Disclosures**

We may disclose personal information to any person performing audit, legal, operational, or other services for us. We will use information which does not identify the individual for these activities whenever reasonably possible.

We may also disclose your personal information:

- as required by law, such as to comply with a subpoena, or similar legal process
- as described in our Notices of Privacy Practices for protected health information
- when we believe in good faith that disclosure is necessary to protect our rights, protect you or others from threats of imminent harm, investigate fraud or other activity in violation of the law, or respond to a government request
- to protect the security and reliability of the Website
- if Neda Skin Solutions is involved in a merger, acquisition, or sale of all or a portion of its assets.
- to any other third party with your prior consent to do so
- With your consent or at your direction, including if we notify you through our Services that the information you provide will be shared in a particular manner and you provide such information.
- We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

### **Re-targeting**

We may partner with a third-party ad network to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect non-personally identifiable information about your activities on the Websites and to then provide you with Neda Skin Solutions advertising on other websites. We may also place a persistent third-party cookie (provided by Google) on your hard drive if you sign on to the Website. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt out by email [marketing@phynet.com](mailto:marketing@phynet.com). Neda Skin Solutions is not responsible

for the content or policies of external Internet sites, or mobile apps. Please note this does not opt you out of being served advertising. You may continue to receive generic non-targeted ads.

### **Emails and SMS Text Messaging**

In addition to communicating directly with you, we may use a third-party vendor to help us manage some of our electronic communications with you, including email and text messages. While we do supply these vendors with email addresses or mobile telephone numbers of those, we wish them to contact, your email address or mobile telephone number is never used for any purpose other than to communicate with you on our behalf. When you click on a link in an email, you may temporarily be redirected through one of the vendor's servers (although this process will be invisible to you) which will register that you've clicked on that link and have visited our website. We will never share any information, other than your email address or telephone number, with our third-party vendors, which may only share this information with its authorized subcontractors.

Even if you have given us permission to send emails or text messages to you, you may revoke that permission at any time by following the "unsubscribe" information at the bottom of the email or by replying "Stop" to any text message you receive from us.

### **Evaluation and Quality Improvement**

We may periodically ask users to complete surveys asking about their experiences with features of the Website. Our surveys may ask visitors for demographic information such as age, gender, and education, but will not request that users provide specific information about any medical condition. We use survey information for evaluation and quality improvement purposes, including helping Neda Skin Solutions to improve information and services offered through the Websites. In addition, users giving feedback may be individually contacted for follow-up due to concerns raised during such evaluation. Demographic information and Web log data may be stored for future evaluation and quality improvement activities.

### **Messages and Transactions**

Comments or questions sent to us may be shared with Neda Skin Solutions staff and health care professionals who are most able to address your concerns. We will archive your messages once we have made our best effort to provide you with a complete and satisfactory response.

Some of our services such as our automated appointment selection may interact directly with our other data systems. Data about your transaction may be stored in these systems, and available to people who test and support these systems.

### **Credit Card Transaction**

If you provide us with your credit card information for payments, we will treat your credit card number in a secure manner.

### **Data Integrity**

If your personal information changes, or to update or request deletion of information collected via our Website, please use the contact information in the "Questions, Complaints, and Contacts" section below. We will respond to all access requests within 30 days.

## **Children**

We do not knowingly collect personally identifiable information from children under the age of 13. If we are made aware of the collection of information from a child under 13 we will delete this information.

## **Opt-Out**

If a user makes a request to receive information in an ongoing manner through the Website by providing an email address or mobile phone number, the user may request to discontinue future mailings or messages. Similarly, if you receive information about a Neda Skin Solutions service through email or text message, you may make a request to discontinue receiving similar messages in the future. All such materials sent to you by email or text message will contain information about how to opt out.

## **Other Requests to Limit Use and Disclosure of your Personal Information**

State and federal laws may allow you to request that we limit our use and disclosure of your personal information for treatment, payment, and health care operations purposes. We will consider all requests and, if we deny your request, we will notify you in writing. Federal law requires us to agree to your request to restrict disclosures to a health plan or insurer relating to specific health care services if you have paid for those services in full.

## **Data Retention**

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Links to Third Party Websites**

Our website may include links to other websites whose privacy practices may differ from those of Neda Skin Solutions. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

## **Questions, Complaints, and Contacts**

If you have any questions about this Privacy Statement, our policies and practices concerning the Website, your rights under this statement, and your dealings with the Website, you can contact Neda Skin Solutions at

privacy@phynet.com

or via mail to:

Attn: Compliance Officer  
302 Innovation Drive Suite 400  
Franklin, TN 37067