

Notice of Privacy Practices Sept 1, 2018

Nura, P.A. Privacy Policy

We at NURA, P.A. (“NURA,” “we” or “us”) are committed to disclosing our privacy and data security policies. Our policy regarding the collection and use of your information via the www.NuraClinics.com website (“Website”) is set forth below.

Agreement to Privacy Policy

YOUR ACCESS AND USE OF THIS WEBSITE IS SUBJECT TO YOUR AGREEMENT WITH THE BELOW POLICY, ALONG WITH THE NURA TERMS & CONDITIONS OF USE WHICH GOVERNS THIS PRIVACY POLICY. NURA ALSO PROTECTS THE PRIVACY OF YOUR HEALTH INFORMATION IN ACCORDANCE WITH THE HIPAA NOTICE OF PRIVACY PRACTICES. BY ACCESSING OR USING THIS WEBSITE, YOU EXPRESSLY AGREE TO THE TERMS OF THIS PRIVACY POLICY AND CONSENT TO THE COLLECTION AND USE OF INFORMATION AS DISCUSSED IN THIS PRIVACY POLICY. ANY CAPITALIZED TERMS NOT DEFINED HEREIN SHALL HAVE THE MEANING SET FORTH IN THE TERMS OF USE.

IF YOU DO NOT AGREE WITH THE BELOW POLICY, PLEASE DO NOT USE OR ACCESS THIS WEBSITE FOR ANY PURPOSE. PLEASE PRINT A COPY OF THIS PRIVACY POLICY FOR YOUR RECORDS.

Modifications to Privacy Policy

NURA MAY REVISE THIS POLICY REGARDING THE COLLECTION OF INFORMATION AT ANY TIME. SHOULD ANY NEW MODIFICATIONS TO THIS PRIVACY POLICY TAKE EFFECT, NURA WILL GIVE NOTICE TO YOU AND ALL USERS BY POSTING A NOTICE REGARDING THE NEW MODIFICATIONS TO THIS PRIVACY POLICY ON THIS WEBSITE, AND THE NEW MODIFIED PRIVACY POLICY WILL APPLY ONLY TO INFORMATION COLLECTED THEREAFTER. BY ACCESSING OR USING THIS WEBSITE AFTER SUCH CHANGES ARE POSTED YOU AGREE AND CONSENT TO ALL SUCH CHANGES.

Applicability of this Privacy Policy

This Privacy Policy applies solely to the Website and provides you information on the specific information that NURA may collect from you via the Website and how we may use it, whether you are using the Website as a visitor or a patient.

If you are a patient, use and disclosure of your identifiable health information is subject to our NOTICE OF PRIVACY PRACTICES. When you receive services, NURA protects your information in accordance with applicable law. In the event of any conflict between this Privacy Policy and the Notice of Privacy Practices, the Notice of Privacy Practices shall control.

Types of Information Collected

NURA collects several types of information from and about users of the Website, including information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number or any other identifier by which you may be contacted online or offline (known as, “personal information”);
- relating to your individual past, present or future physical or mental health condition, the provision of health care to you, or the past, present or future payment for the provision of health care to you, including demographic data, and that identifies you or for which there is a reasonable basis to believe it can be used to identify you (known as, “identifiable health information”);
- that is about you but individually does not identify you; and/or
- about your internet connection, the equipment you use to access the Website and usage details.

Disclosure of Information Practices

The amount and type of information that we collect depends on how you use this Website and the information you choose to submit to us via the Website.

The information NURA collects on or through the Website includes the information you provide directly to NURA, such as:

- information that you provide to NURA by filling in forms on the Website, including when you request an appointment;
- records and copies of your correspondence, if you contact NURA;
- your search queries on the Website; and/or
- your responses to quizzes or surveys on the Website.

We or a third party vendor on behalf of NURA may track your use of the Website and may also capture the paths taken as you move from page to page (i.e., your “click stream” activity) to improve the content and features of the Website using automatic data collection technologies, as described below.

You are not required to provide identifiable health information to visit this Website. However, if you are a patient seeking a physician referral or requesting information, you will be asked to provide certain identifiable health information in order to complete your request. For example, if you choose to use the Request an Appointment feature, we may collect certain personal information from you including your name, email address and phone number. Communications sent via this feature are recorded and maintained by NURA in accordance with applicable law.

Either NURA or our third party vendor on behalf of NURA may also collect your information, which is automatically collected as you browse or otherwise access this Website. We may collect such information by tracking, or asking our third party vendor to track, your click-stream activity when such information is not tied to a user ID through the use of “cookie” technology or by tracking internet protocol (IP) addresses, as explained below.

Cookies

Like many companies, we may use “cookie” technology on and off of the Website. “Cookies” are small pieces of information that are stored by your browser on your computer’s hard drive. They enhance your online experience by saving your preferences while you are visiting a particular website. The cookies do not contain any identifiable health information and cannot profile your system or collect information from your hard drive.

When you view our Website we may place a cookie on your computer, which may be either temporary or permanent. Temporary cookies are used to complete transactions with this Website and for other purposes such as counting the number of visits to our certain web pages. These temporary cookies are eliminated when you exit your browser.

A permanent cookie may also be stored on your computer by your browser. When you log in, this type of cookie tells us whether you’ve visited us before or if you are a new visitor. The cookie doesn’t obtain any identifiable health information about you or provide us with any way to contact you, and the cookie doesn’t extract any information from your computer.

The “help” portion of the toolbar on most browsers will tell you how to prevent your browser from accepting certain types of cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Please note that disabling temporary cookies may prevent you from using and accessing this Website. Disabling permanent cookies may also impact your use and access of the Website and in particular will not allow you to see any personalization on the Website that you may activate.

In addition, if you visit our Website again after deleting a cookie, a new cookie may be activated.

Since third parties may use their own cookies when you click on a hypertext link to their site or service, you should carefully review the privacy policy of other sites you link to from our Website.

IP Addresses

We may also log and track IP addresses for systems administration purposes and for reporting usage trends. Your IP address is usually associated with the physical place from which you enter the Internet, the name of the domain and host from which you access the Internet, the browser software you use and your operating system, and the date and time you access the Website. By collecting your IP address, we may record the page that linked you to this Website, the web pages you visit, the ads you see or click on, and other information about the type of web browser, computer, platform and settings you are using, and any search terms you enter on this Website. IP addresses

are not used to track an individual user's session. This information only helps us determine how often different areas of our Website are visited.

We may combine certain information collected automatically (such as through IP addresses, cookies or click-stream monitoring) with any previously submitted personally identifiable information, including health information, that we may have received from you.

Geographic Location

We may collect your geographic location based on your IP address and other location-based data. However, we do not collect any device identifications.

Analytics

We may also use various third party internet vendors to collect, track and analyze track analytical data regarding Website usage and trends.

Do Not Track Disclosure

The Website does not monitor for or behave differently if your computer transmits a "do not track" or similar beacon or message.

How Will Your Information Be Used And Disclosed?

We use information that we collect about you or that you provide to us, including any personal information:

- To provide and respond to your request for an appointment.
- To allow you to participate in the interactive features of the Website, such as commenting on the NURA blog.
- To communicate with you and otherwise respond to your questions and suggestions.
- To present the Website and its contents to you.
- To customize your browsing experience.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to the Website and any services we offer or provide through it.
- In any other way we may describe when you provide the information.

For any other purpose with your consent.

We may disclose information that we collect about you or that you provide to us, including any personal information to:

- Our subsidiaries and affiliates.
- Our contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep

personal information confidential and use it only for the purposes for which we disclose it to them.

- A buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of NURA's equity or assets.
- Comply with any court order, law or legal process, including responding to any government or regulatory request.
- Enforce or apply NURA Terms of Use and other agreements, including for billing and collection purposes.
- Protect the rights, property, or safety of NURA, its patients or others, as is necessary or appropriate.
- Fulfill any other purpose disclosed by NURA when you provide the information.
- Fulfill any other purpose to which you consent.

We will not sell, share lease or rent the information that is collected via the Website to others in ways that differ from what is disclosed in except in accordance with this Privacy Policy.

Identifiable Health Information

We may use any identifiable health information or other information that you voluntarily provide us in order to provide you with information, products or services that you may request from NURA.

If you are a patient or the legal representative of a patient, any identifiable health information that you share via the Website may be made accessible to NURA and may become a part of the records maintained by NURA, which records are subject to the NURA HIPAA Notice of Privacy Practices.

We may share your identifiable health information only with our suppliers and vendors to the limited extent permitted by applicable law. We require those suppliers and vendors to comply with all applicable data privacy laws and regulations, including HIPAA. We do not sell, lease or rent your identifiable health information.

De-Identified Data

We may aggregate and de-identify information about our users, including personal information and identifiable health information, in accordance with HIPAA identifiable health information, either alone or with other data to create anonymous "de-identified data" regarding the users of our Website. Such aggregated, de-identified data is information that describes the habits, usage patterns and/or demographics of users as a group but does not reveal the identity of particular users. This data will not identify you, but will be used as statistical information to determine such things as user demographics and usage patterns of our Website. NURA may use de-identified data to understand the needs of our community of users and determine what kinds of

programs and services we can help provide. NURA may disclose or use such de-identified data without restriction.

Other Use and Ownership

NURA maintains full rights to any information collected on this Website, and may freely collect, use and disclose such information unless prohibited by this Privacy Policy, the HIPAA Notice of Privacy Practices or applicable law.

Security

While no web site can guarantee security, we maintain physical, administrative, electronic, technical and procedural safeguards designed to help protect your personal information collected via the Website as required by applicable law. While we cannot guarantee that loss, misuse or alteration to data will not occur, we may use industry standards, such as Secure Socket Layers (“SSL”) technology, to help safeguard against such occurrences. In certain areas, the information passed between your browser and our system is encrypted with SSL technology to create a protected connection between you and our Website to ensure confidentiality.

We maintain safeguards designed to keep our data center both physically and electronically secured, including firewall and encryption technology. We limit access to your personally identifiable information about you to our employees and third-party agents, who we reasonably believe need to have access to your in accordance with this Privacy Policy.

In the event that a breach in our security systems occurs and there is a possibility that an unauthorized person acquires your personal or unsecured health information, we will notify you of such a breach as may be required by applicable law.

In order to help maintain security, you should never share your user ID or password and should always sign out when you are finished using the Website.

You acknowledge and agree that any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures employed by NURA or contained on the Website.

Third Party Websites

If you use the Website to link to another web site, which is not controlled or maintained by NURA, such as the Patient Portal, you may decide to disclose personal information at that web site. For example, you might provide your contact information to obtain an information packet from an organization. Please be aware that in contacting that site, or in providing information on that site, that third party may obtain personal information about you. This Privacy Policy, the Terms of Use, and the HIPAA Notice of Privacy Practices does not apply when you leave the Website and go to a third party web site from the Website. We structure the Website so that no personal or health information goes in the search string or URL when you move from the Website to a

linked web site. We encourage you to be aware when you leave our Website and to read the privacy statements of each and every site that collects personally identifiable information.

What if I am accessing this Website from outside of the United States?

If you are visiting our Website from outside the United States, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using the Website, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy. By accessing or using the Website or clicking your agreement to this Privacy Policy when the option is available to you, you acknowledge and consent to the collection, transmission, processing, and storage of your personal information to and in the United States.

Transfer of Data

In the event of a change in control of NURA or sale by NURA of substantially all of its assets or other acquisition, merger or reorganization, any information owned by or in the control of NURA may be transferred to such NURA successor, who will comply with the terms of this Privacy Policy and the HIPAA Notice of Privacy Practices.

Important Note Regarding Children

This Website is not directed toward children under 18 years of age and NURA does not knowingly collect or use information from children under 18 through this Website. Any information submitted via the Website regarding a minor under the age of 18 must be submitted by the minor's legal representative. To the extent permitted by applicable state law, minors may access their health information by contacting NURA at (763) 537-6000.

What if I have questions or concerns regarding this Privacy Policy?

If you have any questions about this Privacy Policy, the HIPAA Notice of Privacy Practices or the use of your information by NURA, please contact us at privacyofficer@nuraclinics.com.

California Civil Code Section § 1798.83 permits users of the Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to privacyofficer@nuraclinics.com

The contents of the NURA Website, such as text, graphics, videos, and other material contained on the Website ("Content") are provided to you for general information only. The content is not intended to be a substitute for professional medical advice,

diagnosis, or treatment. Always seek the advice of your physician or other qualified health provider with any questions you may have regarding a medical condition. Do not disregard, avoid or delay getting professional medical advice from a qualified healthcare professional because of something you have seen on this Website. Further, the sharing of this information for educational purposes does not constitute an endorsement of the product, method or author.