

The MetroHealth System Website Privacy Notice

We are committed to protecting the privacy of all visitors to our website, Metrohealth.org, MetroHealth MyChart, related websites and mobile applications under MetroHealth's control (collectively, the "Site").

We wrote this Privacy Notice ("Notice") to help you understand what information we collect, how we use and protect it, and your choices. The MetroHealth System is referred to in this Notice as "MetroHealth," "we," "us" or "our."

What information we collect

Information you give us

We collect and store information you provide directly to us, such as when you create or modify your account or user preferences, sign up for a newsletter, contact us, respond to a survey, or otherwise communicate with us. This includes information you submit on forms, such as appointment request forms. Some forms collect sensitive information, such as health information, necessary for us to provide services to you. This information may include your name, email address, phone number, postal address, insurance information, personal health information (which, to the extent it is considered Protected Health Information under HIPAA, shall be subject to the MetroHealth Notice of Privacy Practices) survey responses, user content stored or entered into the forms found in our online platforms, and other information you choose to provide through use of our online platforms.

Information we collect automatically

When you interact with our Site, certain information about your use of our Site is automatically collected. This information includes computer and connection information, such as statistics on your page views, traffic to and from our Site, referral Universal Resource Locators (URL), ad data, your Internet Protocol (IP) address, and device identifiers. This information also may include your transaction history, and your web log information, how you search our Site, the websites you click on from our Site or emails, whether and when you open our emails, and your browsing activities across other websites.

Much of this information may be collected through cookies, web beacons and other tracking technologies, as well as through your web browser or device.



How we use the information we collect

The information you provide to us will be used to:

- Set up your account (if applicable)
- Provide you with information described below, unless you tell us not to
- Improve the Site and online platforms
- Respond to your inquiries
- Facilitate your job application
- Fulfill any other purpose for which you provided it

We will not use your information for any purposes other than as described in this Notice or explained to you at the point at which the information was collected.

Email communications, newsletters and related services

MetroHealth communicates with you through newsletters, mailings, email, or other means about treatment options, health-related information, disease management programs, wellness programs or other community-based activities in which MetroHealth participates.

Email communications that you send to us via the email links on our Site may be shared with a customer service representative, employee, medical expert or agent that is most able to address your inquiry. We make every effort to respond in a timely fashion once communications are received. Once we have responded to your communication, it is discarded or archived, depending on the nature of the inquiry.

The email functionality on our Site does not provide a completely secure and confidential means of communication. It's possible that your email communication may be accessed or viewed by another Internet user while in transit to us. If you wish to keep your communication private, do not use our email.

Surveys

We occasionally survey visitors to our Site. The information from these surveys is used in aggregated, de-identified form to help us understand the needs of our visitors so that we can improve our Site. The information may be shared with third parties with whom we have a business relationship. We generally do not ask for information in surveys that would personally identify you; if we do request contact information for follow-up, you may decline to provide it. If survey respondents provide personal information (such as an email address) in a survey, it is shared only with those people who need to see it to respond to the question or request, or with third parties who perform data management services for our Site. Those third parties have agreed to keep all data from surveys confidential.



We may share information with third parties

We may share information as described in this Notice or as otherwise described at the time such information is collected from you. Information shared by us includes:

- Affiliates. We may share information with a parent, subsidiary or affiliate entity within Metrohealth. Any organization to which we provide such information is required to keep it confidential and to only use such information in accordance with this Notice.
- Service Providers. In the course of doing business, we employ other companies and individuals to perform a variety of functions on our behalf. For example, we may provide information as necessary to companies that host our online platforms or send communications on our behalf. These service providers may have access to information about you if it is needed to perform their functions for us, but they are not authorized by us to use or disclose such information except as necessary to perform services on our behalf or to comply with legal requirements, and they are required to maintain the information in confidence.
- Internal Marketing. We may use cookies and other similar technologies for our internal marketing purposes. Cookies are used in some areas of our Site to enable functionality and ease of use for those people visiting, to improve the content on the Site, or track activity on the Site. Some of our affiliate / advertising partners may also use cookies for similar purposes.
- Aggregated and Non-Identified Data. We may maintain and use aggregate data or other non-identified information (i.e., data that does not identify a specific individual), such as usage statistics, device data, online traffic patterns and user feedback. In addition to using this information for the purposes discussed in this Notice, we may disclose such aggregated or non-identified data to third parties without restriction.
- **Legally Required.** We reserve the right to disclose information if required to do so by law or by a regulatory authority. We may also disclose information as part of an investigation or enforcement action relating to improper or illegal conduct in connection with our online platforms or other products, such as a situation that could potentially involve threats to the safety or privacy of any person or misuse of our online platforms.

How we protect the information we collect

Security

We use reasonable security measures to protect the confidentiality of personal information under our control and appropriately limit access to it. We use a variety of information security measures to protect your online transactions with us. Our Site uses encryption technology, such as Secure Sockets Layer (SSL), to protect your personal information during data transport. SSL protects information you submit via our Site, such as information including your name address and credit card number to pay medical bills. MetroHealth cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. We take reasonable steps to ensure the integrity and confidentiality of personally identifiable information that you may provide. However, electronic transmissions via the



Internet are not necessarily secure from interception, and so we cannot absolutely guarantee the security or confidentiality of such transmissions.

Protecting children's privacy

We are committed to protecting children's privacy on the Internet, and we do not knowingly collect personal information from children.

Your choices

By contacting us using the information below, you may:

- Update and correct your personal information
- Cancel your account or request that we no longer use your information to provide you services
- Stop receiving communications from our Site. To stop receiving communications, send an email message to or send regular mail to the following postal address:

MetroHealth Privacy Officer 2500 MetroHealth Drive Cleveland, OH 44109

Phone: 216-778-1601

Email: HIPAAPrivacy@metrohealth.org

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies. If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

Data retention

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

Links to other websites

Our Site link to other websites, many of which have their own privacy policies. Be sure to review the privacy policy on the site you're visiting.

Privacy policy updates

We may need to update our privacy policy as technology changes and MetroHealth evolves. If we make significant changes to the privacy policy, we'll post a prominent message on our Site.



Contact information

If you have a question or concern regarding your privacy, please contact MetroHealth's Privacy Officer using the contact information below:

MetroHealth Privacy Officer 2500 MetroHealth Drive Cleveland, OH 44109 Phone: 216-778-1601

Email: HIPAAPrivacy@metrohealth.org

This Policy was last updated March 2021.