

Last Updated: February 2025

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## **Website Privacy Policy**

This Privacy Statement describes and applies to the information we collect from you when you use voice, mobile device and desktop Brighter Start Health platforms, tools and applications, <https://brighterstarthealth.com/> and other Brighter Start Health websites (collectively the “Services”), how we use that information, and when we disclose it. It will also give you more information about how to manage the personal information that you provide to us through the Services. This statement applies only to information you provide to us online while visiting or using our Services. It does not apply to information we have obtained or may obtain offline through other traditional means.

This Privacy Statement does not apply to any third-party applications that integrate with the Services.

Brighter Start Health also maintains a separate Terms of Use that applies to your use of the Services and a Notice of Privacy Practices, as required by law, that applies to protected health information that it collects from individuals.

### **1. The information we collect.**

When you use our Services, we receive and collect certain information. The information that we receive and collect depends on what you do when you use the Services.

#### **Automatically Collected Information.**

Some information is automatically received and sometimes collected from you when you use the Services. This information may include some or all of the following items: the name of the domain and host from which you access the Internet, including the Internet protocol (IP) address of the computer you are using and the IP address of your Internet Service Provider; the type and version of Internet browser software you use and your operating system; the type and version of your media player(s); the date and time you access our Services, the length of your stay and the specific pages, images, video or forms that you access while using the Services; the Internet address of the website from which you linked directly to our Services and, if applicable, the search engine that referred you and any search strings or phrases that you entered into the search engine to find the Services; and demographic information concerning the country of origin of your computer and the

language(s) used by it. We use this information to monitor the usage of our Services, assess performance, ensure technological compatibility with your computer, and understand the relative importance of the information provided on our Services. We may also use this data to conduct statistical analyses on visitors' usage patterns and other aggregated data.

### **Information Collected via Cookies.**

“Cookies” are small files or records that we place on your computer’s hard drive to distinguish you from other visitors using the Services. The use of cookies is a standard practice among websites to collect or track information about your activities while using the Services. Some websites use persistent cookies, which are placed on your computer and remain there until you delete them. Others use temporary cookies, which expire after some period or become overwritten by other data. Brighter Start Health Services use “session cookies” which disappear from your computer after you have closed your Internet browser.

Most people do not know that cookies are being placed on their computers when they use Brighter Start Health Services or most other websites because browsers are typically set to accept cookies. You can choose to have your browser warn you every time a cookie is being sent to you or you can turn off cookie placements. If you refuse cookies, you can still use Brighter Start Health Services, but your overall experience may be affected and some functionality may be reduced or unavailable.

### **Information Collected Using Pixel Tags or Clear GIFs.**

Pixel Tags or Clear GIFs, also known as Web Beacons or Web Bugs, are transparent graphical images placed on a website. Currently, Brighter Start Health does not use them on its site.

### **Information You Actively Submit.**

For most of the activity using our Services, we neither require nor collect “User Information.” User Information is information that could personally identify you, for example, your name, e-mail address, billing address, shipping address(es), phone number, social security number, and credit card information. You can browse Brighter Start Health Services and take as much time as you want to review our services without having to submit such User Information.

User Information is required when you want to (i) submit a job application; (ii) make an online donation; (iii) sign up for a class or event conducted at one of our medical centers; (iv) send an e-mail message to us or otherwise provide online comments, criticisms,

suggestions or feedback; (v) participate in a chat session; (vi) purchase merchandise from the Brighter Start Health Store; (vii) reserve a spot or make an appointment at a Brighter Start Health facility; or (viii) pre-register for a hospital procedure such as surgery.

Brighter Start Health uses a third party to host the Brighter Start Health Store. If you purchase merchandise from Brighter Start Health, Brighter Start Health will share your User Information, including, your name, address, telephone number, credit card number, and billing and shipping address, with third parties filling your order. Brighter Start Health does not warrant and cannot guarantee the information privacy policies and practices of such third parties.

We do not require you to provide any personal medical information about yourself to us through the Services, and we ask that you not share personal medical information through the Services, especially information that you wish to keep confidential. Information you provide through our Services is not protected under confidentiality laws that protect physician-patient communications. Please carefully select what you choose to disclose. In addition, while Brighter Start Health attempts to prevent unauthorized access to our Services, such access may occur. Personal medical information that Brighter Start Health receives in any manner is subject to separate privacy practices.

### **Personal Information about Children.**

The Brighter Start Health Services are targeted primarily for use by adults. Accordingly, we do not knowingly collect age identifying information, except on job applications and reservation forms, nor do we knowingly collect any personal information from children under the age of 18. However, we advise all visitors utilizing our Services under the age of 18 not to disclose or provide any User Information on our Services. In the event that we discover that a child under the age of 13 has provided User Information to us, in accordance with the Children's Online Privacy Protection Act (see the Federal Trade Commission's web site for more information about this Act), we will delete the child's User Information from our files to the extent technologically possible.

## **2. How we use and share User Information.**

### **1- SMS Consent Communication:**

The information (Phone Numbers) obtained as part of the SMS consent process will not be shared with third parties for SMS marketing purposes.

### **2- Types of SMS Communications:**

If you have consented to receive text messages from Brighter Start Health, you may receive messages related to the following):

- Appointment reminders
- Follow-up messages
- Billing or finance inquiries
- Coordination of Care, including alumni coordination or other care outreach
- Office communications

### **3- Message Frequency:**

Message frequency may vary depending on the type of communication, and the basis for communication.

### **4- Potential Fees for SMS Messaging:**

Please note that standard message and data rates may apply, depending on your carrier's pricing plan. These fees may vary if the message is sent domestically or internationally.

### **5- Opt-In Method:**

You may opt-in to receive SMS messages from Brighter Start Health in the following ways:

- By submitting an online form
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### **6- Opt-Out Method:**

You can opt out of receiving SMS messages at any time. To do so, simply reply "STOP" to any SMS message you receive. Alternatively, you can contact us directly to request removal from our messaging list.

### **7- Help:**

If you are experiencing any issues, you can reply with the keyword HELP. Or, you can get help directly from us by calling our office.

### **Additional Options:**

- If you do not wish to receive SMS messages, you can choose not to check the SMS consent box on our forms.

### **8- Standard Messaging Disclosures:**

- Message and data rates may apply.
- You can opt out at any time by texting "STOP."

- For assistance, text "HELP" or visit our Privacy Policy
- Message frequency may vary depending on how frequently you communicate with us via SMS and may be an estimated 100-150 messages per month

When you actively submit User Information through the Services including SMS or email information, for example, *We obtain SMS consent on our website via the Contact Us form: <https://brighterstarthealth.com/contact/>*, where this is a checkbox to allow our clients to opt in to SMS messaging, we will use that information in one or more of the following ways:

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- 
- To process, complete or otherwise act upon or respond to your request or reason for submitting that information;
- 
- To register and/or verify you in connection with a service or feature that you are attempting to access or obtain;
- 
- To communicate with you about your request or reason for submitting that information;
- 
- To provide additional information to you about Brighter Start Health and its services that we believe may interest you;
- 
- To study and analyze the use of the information and features available on our Services; and
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- To assist, when necessary, in protecting our rights or property, enforcing the provisions of our Privacy Statement and Terms of Use, and/or preventing harm to you or others.

- Phone numbers collected for SMS messaging, will not be shared with third parties for marketing or affiliates
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- We do not sell User Information to third parties
- We only share your User Information with third parties under the limited circumstances stated below:
- 
- Credit card authorization companies receive the credit card number and other personal identifying information only to verify the credit card numbers and process a transaction.
- 
- User Information is disclosed to third parties necessary to process a particular request you have made, to complete a purchase order for merchandise and to deliver your purchase to you or to process a donation.
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- User Information submitted regarding a job application may be disclosed to third parties to conduct background checks, obtain credit reports, verify prior employment, check references and for any other lawful purpose that is in our judgment reasonably necessary to our interviewing and hiring process.
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- User Information is subject to disclosure in response to judicial or other governmental subpoenas, warrants and court orders served on Brighter Start Health in accordance with their terms, or as otherwise required by applicable law.
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- User Information is subject to disclosure to protect our rights or property, to enforce the provisions of our Privacy Statement and Terms of Use, and/or to prevent harm to you or others.
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- User Information may be disclosed and transferred if Brighter Start Health or its business is sold or offered for sale to another company or person(s), if a

petition for relief under the United States Bankruptcy Laws is filed by or against Brighter Start Health, or if Brighter Start Health becomes subject to an order of appointment of a trustee or receiver.

- - If you communicate with us via e-mail, we will share your correspondence, including any User Information provided in the e-mail, with employees, volunteers, representatives, or agents most capable of addressing your correspondence. We will retain your communication until we have done our very best to provide you with a complete and satisfactory response and may subsequently retain your communication for our records.
- - Except where we are compelled by law to disclose your User Information, you have a right to choose whether we disclose your User Information to a third party or use your User Information for a purpose incompatible with the purpose(s) for which it was originally provided or subsequently authorized by you. Except where we are compelled by law to maintain your User Information, you also have a right to choose whether we keep your User Information. Please notify us using the contact information provided below if you wish to opt out of any such use. Please be aware that opting out of certain third-party use may prevent us from providing the services or products that you request.

All comments, feedback, suggestions, ideas, and other submissions disclosed, submitted, or offered to Brighter Start Health regarding your use of our Services (collectively “Comments”) shall be and remain the property of Brighter Start Health. Unless otherwise prohibited by law, you agree that Brighter Start Health may use or disclose Comments in any manner, without restriction and without compensation to you.

### **3. Linking to third-party websites.**

When you click on links in our Services that take you to third-party websites, you will be subject to the third parties’ privacy policies. While we support the protection of privacy on the Internet, Brighter Start Health cannot be responsible for the actions of any third-party websites. We encourage you to read the posted privacy statement of any and every site you visit, whether you are linking from our Services or browsing on your own.

### **4. Access to and managing your User Information.**

We believe it is important for you to be able to find out what User Information you have provided to us through our Services. If you have provided us with User Information, you can contact us to request that we provide you with the User Information we have in our records about you. We reserve the right to limit the number of times such a request can be made and to charge you for responding to such requests if this process is misused or abused. You may contact us using the contact information provided below to inquire about your User Information, and to correct, amend, or delete such information. We want the User Information we have on record about you to be as complete and accurate as possible.

If you believe that any User Information we have in our records about you is inaccurate, incomplete, or incompatible with the purposes for which it was provided or subsequently authorized by you, please notify us using the contact information provided below.

#### **5. What you need to do to protect your Personally Identifiable Information.**

You have several options when deciding how you can best protect your User Information. One option is simply not to volunteer it. As stated above, this approach would allow you to still use our Services – although it will prevent you from taking advantage of some of our Services' features, for example, completing an order, making an appointment and signing up for classes. The Federal Trade Commission's website, [www.ftc.gov](http://www.ftc.gov), also offers useful information about how to protect User Information provided to a website.

#### **6. What to do about suspected violations of this Privacy Statement.**

If at any time you believe Brighter Start Health has not adhered to the policies and principles set forth in this Privacy Statement, please notify us using the contact information provided below. We will make all commercially reasonable efforts to promptly address your concerns.

#### **7. Changes to Privacy Statement.**

This Privacy Statement was last modified on the date noted above. If we change our Privacy Statement, we will post those changes on our website so you are always aware of what information we collect, how we use it, how we protect it and under what circumstances, if any, we disclose it. If we make material changes, we will also post a notice on our home page, which notice will run for seven consecutive days following the effective date of the modified privacy statement. Unless we clearly express otherwise, we will use information in accordance with the Privacy Statement under which the information was collected. **YOU ARE HEREBY ADVISED THAT YOUR CONTINUED USE OF OUR SERVICES CONSTITUTES YOUR ACCEPTANCE OF ANY AMENDMENTS TO AND THE MOST RECENT VERSION OF THIS PRIVACY STATEMENT.**



## **8. Questions, comments and contact information.**

If you have any questions or comments concerning our Privacy Statement, please contact us at (910) 809-4511

### **Uses and Disclosure of Health Information**

#### **THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY**

Brighter Start Health is committed to protecting the privacy of the personal and health information we collect or create as part of providing health care services to our clients, known as “Protected Health Information” or “PHI”. PHI typically includes your name, address, date of birth, billing arrangements, care, and other information that relates to your health, health care provided to you, or payment for health care provided to you. PHI DOES NOT include information that is de-identified or cannot be linked to you.

This notice of Health Information Privacy Practices (the “Notice”) describes Brighter Start Health’s duties with respect to the privacy of PHI, Brighter Start Health’s use of and disclosure of PHI, client rights and contact information for comments, questions, and complaints.

### **Brighter Start Health’s PRIVACY PROCEDURES AND LEGAL OBLIGATIONS**

Brighter Start Health obtains most of its PHI directly from you, through care applications, assessments and direct questions. We may collect additional personal information depending upon the nature of your needs and consent to make additional referrals and inquiries. We may also obtain PHI from community health care agencies, other governmental agencies or health care providers as we set up your service arrangements.

Brighter Start Health is required by law to provide you with this notice and to abide by the terms of the Notice currently in effect. Brighter Start Health reserves the right to amend this Notice at any time to reflect changes in our privacy practices. Any such changes will be applicable to and effective for all PHI that we maintain including PHI we created or received prior to the effective date of the revised notice. Any revised notice will be mailed to you or provided upon request.

Brighter Start Health is required by law to maintain the privacy of PHI. Brighter Start Health will comply with federal law and will comply with any state law that further limits or restricts the uses and disclosures discussed below. In order to comply with these state and federal laws, Brighter Start Health has adopted policies and procedures that require its

employees to obtain, maintain, use and disclose PHI in a manner that protects client privacy.

### **Uses and Disclosures With Your Authorization**

Except as outlined below, Brighter Start Health will not use or disclose your PHI without your written authorization. The authorization form is available from Brighter Start Health (at the address and phone number below). You have the right to revoke your authorization at any time, except to the extent that Brighter Start Health has taken action in reliance on the authorization.

The law permits Brighter Start Health to use and disclose your PHI for the following reasons without your authorization:

**For Your Treatment:** We may use or disclose your PHI to physicians, psychologists, nurses and other authorized healthcare professionals who need your PHI in order to conduct an examination, prescribe medication or otherwise provide health care services to you.

**To Obtain Payment:** We may use or disclose your PHI to insurance companies, government agencies or health plans to assist us in getting paid for our services . For example, we may release information such as dates of treatment to an insurance company in order to obtain payment.

**For Our Health Care Operations:** We may use or disclose your PHI in the course of activities necessary to support our health care operations such as performing quality checks on your employee services. We may also disclose PHI to other persons not in Brighter Start Health 's workforce or to companies who help us perform our health services (referred to as "Business Associates") we require these business associates to appropriately protect the privacy of your information.

**As Permitted or Required By The Law:** In some cases we are required by law to disclose PHI. Such as disclosers may be required by statute, regulation court order, government agency, we reasonably believe an individual to be a victim of abuse, neglect or domestic violence: for judicial and administrative proceedings and enforcement purposes.

**For Public Health Activities:** We may disclose your PHI for public health purposes such as reporting communicable disease results to public health departments as required by law or when required for law enforcement purposes.

**For Health Oversight Activities:** We may disclose your PHI in connection with governmental oversight, such as for licensure, auditing and for administration of government benefits. The Arizona Department of Human Services is an example of an agency that oversees Brighter Start Health 's operations.

**To Avert Serious Threat to Health and Safety:** We may disclose PHI if we believe in good faith that doing so will prevent or lessen a serious or imminent threat to the health and safety of a person or the public.

**Disclosures of Health Related Benefits or Services:** Sometimes we may want to contact you regarding service reminders, health related products or services that may be of interest to you, such as health care providers or settings of care or to tell you about other health related products or services offered at Brighter Start Health. You have the right not to accept such information.

**Incidental Uses and Disclosures:** Incidental uses and disclosures of PHI are those that cannot be reasonably prevented, are limited in nature and that occur as a by-product of a permitted use or disclosure. Such incidental used and disclosures are permitted as long as Brighter Start Health use reasonable safeguards and use or disclose only the minimum amount of PHI necessary.

**To Personal Representatives:** We may disclose PHI to a person designated by you to act on your behalf and make decisions about your care in accordance with state law. We will act according to your written instructions in your chart and our ability to verify the identity of anyone claiming to be your personal representative.

**To Family and Friends:** We may disclose PHI to persons that you indicate are involved in your care or the payment of care. These disclosures may occur when you are not present, as long as you agree and do not express an objection. These disclosures may also occur if you are unavailable, incapacitated, or facing an emergency medical situation and we determine that a limited disclosure may be in your best interest. We may also disclose limited PHI to public or private entity that is authorized to assist in disaster relief efforts in order for that entity to locate a family member or other person that may be involved in caring for you. You have the right to limit or stop these disclosures.

### **Your Rights Concerning Privacy**

**Access to Certain Records:** You have the right to inspect and copy your PHI in a designated record set except where State law may prohibit client access. A designated record set contains medical and billing and case management information. If we do not have your PHI record set but know who does, we will inform you how to get it. If our PHI is a copy of information maintained by another health care provider, we may direct you to request the PHI from them. If Brighter Start Health produces copies for you, we may charge you up to \$1.00 per page up to a maximum fee of \$30.00. Should we deny your request for access to information contained in your designated record set, you have the right to ask for

the denial to be reviewed by another healthcare professional designated by Brighter Start Health.

**Amendments to Certain Records:** You have the right to request certain amendments to your PHI if, for example, you believe a mistake has been made or a vital piece of information is missing. Brighter Start Health is not required to make the requested amendments and will inform you in writing of our response to your request.

**Accounting of Disclosures:** You have the right to receive an accounting of disclosures of your PHI that were made by Brighter Start Health for a period of six (6) years prior to the date of your written request. This accounting does not include for purposes of treatment, payment, health care operations or certain other excluded purposes, but includes other types of disclosures, including disclosures for public health purposes or in response to a subpoena or court order.

**Restrictions:** You have the right to request that we agree to restrictions on certain uses and disclosures of your PHI, but we are not required to agree to your request. You cannot place limits on uses and disclosures that we are legally required or allowed to make.

**Revoke Authorizations:** You have the right to revoke any authorizations you have provided, except to the extent that Brighter Start Health has already relied upon the prior authorization.

**Delivery by Alternate Means or Alternate Address:** You have the right to request that we send your PHI by alternate means or to an alternate address.

**Complaints & How to contact us:** If you believe your privacy rights have been violated, you have the right to file a complaint by contacting Brighter Start Health at the address and/or phone number indicated below. You also have the right to file a complaint with the Secretary of the United States Department of Health and Human services in Washington, D.C. Brighter Start Health will not retaliate against you for filing a complaint.

If you believe your privacy rights have been violated, you may make a complaint by contacting Brighter Start Health at (910) 809-4511 or the Secretary for the Department of Health and Human Services. No individual will be retaliated against for filing a complaint.

The U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201  
Toll Free: 1-877-696-6775