



Privacy Policy

Brighter Dawn Medical respects the privacy of information that identifies you or is identifiable to you (Personal Information). We want you to understand how we process your Personal Information, and how you can submit privacy rights requests to us concerning your Personal Information, in compliance with the various laws in the United States that govern Brighter Dawn Medical's processing of Personal Information (Data Privacy Laws). Our processing of Personal Information is governed by those Data Privacy Laws as well as this Privacy Policy (Policy).

Protected health information (PHI) as defined under the Health Insurance Portability & Accountability Act and related regulations (HIPAA) is covered separately in our HIPAA Notice of Privacy Practices. For purposes of this Policy, PHI is not a category of Personal Information or Sensitive Personal Information, and is not covered by this Policy.

1. Data Privacy Officer and Security Policy

For questions about Brighter Dawn Medical's processing of your Personal Information or this Policy, please contact our Data Privacy Officer as follows:

Phone: (717) 447-2910, option 1
Email: megan@brighterdawnmedical.com
Address: 108 Roadcap Road
Millersburg, PA 17061

2. Personal Information

Brighter Dawn Medical provides healthcare services, including urgent care, primary care, functional medicine, and virtual care (Services) to individuals and their families. In the course of providing the Services, Brighter Dawn Medical receives from individuals and their families, itself collects, and processes Personal Information, which may include the following: (1) identifiers, such as first and last name; email address; billing address; and phone number; (2) demographic information, such as your age, date of birth, sex and/or gender, race and/or ethnicity, and language preferences; (3) account information, such as your username and password, if you create an account with us (4) financial information, such as your credit or debit card information; provided however that Brighter Dawn Medical does not store or has access to any such payment and credit information and uses a third-party payment processor to process all such payments.

In certain situations, Brighter Dawn Medical may partner with certain third parties and use third party tools in the course of providing Services, and our website may contain links to sites provided by third parties. Brighter Dawn Medical has no control over the policies and practices of third-party websites as to privacy or anything else. Please review the applicable third-party website's policies for further information regarding their collection and processing of Personal Information. The manner in which these third parties collect, and process Personal Information is governed by the policies that apply to these third parties.



Depending on how you interact with us, we may collect Personal Information when you: (1) visit our website; (2) register for, inquire about, or use the Services; (3) create an account with us on our patient portal, or otherwise use or access the Services; (3) fill out or complete any form available on our website; (4) communicate with us directly or indirectly via email or other methods; (5) subscribe to our mailing lists, newsletter, or other forms of communications; (6) respond to a survey or enter a promotion; and (5) otherwise interact with us.

Brighter Dawn Medical has collected Personal Information in the last twelve months and processed it for the purposes described in this Policy.

3. Sensitive Information Processed

In addition, in the course of providing Services, Brighter Dawn Medical may receive, itself collect, and process certain types of Personal Information that is of a sensitive nature (Sensitive Personal Information), including information about the following: (1) information about individuals who are minors in the jurisdiction where they reside; (2) Social Security number; (3) governmental identification number, including, but not limited to, driver's license, non-driver identification, passport, and military identification number; (4) credit card, debit card, and bank and other financial account number, and other card holder information (except to the extent we require you to do so); provided however that Brighter Dawn Medical does not store or has access to any such payment and credit information and uses a third-party payment processor to process all such payments; (5) race, ethnic origin, national origin, citizenship, immigration status, religious and political belief and affiliation, and sexual orientation and identity; (6) biometric information; and (7) precise geolocation information.

4. Legal Bases and Purpose for Processing Personal Information

Brighter Dawn Medical has contractual and other commercial, business, and legal relationships to provide Services to individuals and their families. As a result, individuals and their families provide Personal Information to Brighter Dawn Medical and Brighter Dawn Medical collects and processes Personal Information to provide Services to them. In addition, Brighter Dawn Medical seeks and obtains consent for the use of Personal Information if and to the extent consent is required for processing of Personal Information under Data Privacy Laws. That is the legal basis for Brighter Dawn Medical to process Personal Information.

Brighter Dawn Medical may process Personal Information to: (1) provide, develop, maintain, and enhance the Services, and our website; (2) communicate with you about the Services; (3) provide support for the Services including responding to requests, questions, feedback and technical support; (4) process and complete transactions, and send related information, including purchase confirmations and invoices; (5) personalize your experience with the website; (6) send you communications about our Services that we believe may be of interest, such as information about features, offers, catalogues, promotions, and events; (7) maintain the safety, security, and integrity of our Services, and our website; (8) comply with legal and regulatory obligations, and (9) establish, enforce, and otherwise exercise our rights and defend against claims.

5. Disclosure of Personal Information



Except as necessary or appropriate to provide Services, Brighter Dawn Medical does not disclose Personal Information about you to other unaffiliated third parties, provided that we may disclose Personal Information for the following purposes and in the following circumstances.

- If directed to do so by the individual about whom such Personal Information pertains or that individual's legal representative
- If required to do so by Data Privacy Law, any other law, rule, or regulation, legal process or warrant, or order of any court or governmental agency or authority
- To our agents and service providers necessary or appropriate to provide the Services, such as information technology and security providers, data hosting services, providers that process payments, attorneys, accountants, tax professionals, financial advisers, or any other third party that is necessary or appropriate for Brighter Dawn Medical to disclose Personal Information to in order to provide the Services. Unless we tell you differently, our agents and service providers do not have any right to use the Personal Information we share with them beyond what is necessary to assist us in providing Services to you.
- In connection with a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation of Brighter Dawn Medical
- If we determine that doing so would be in the public's interest
- For protection of Brighter Dawn Medical and others.

6. Disclosure for Marketing Purposes and TCPA Compliance

From time to time, Brighter Dawn Medical may disclose some of your Personal Information to our service providers and/or subcontractors to assist us in our marketing activities. Our service providers and/or subcontractors do not have any right to use the Personal Information we share with them beyond what is necessary to assist us in providing Services to you. If and to the extent we send you any **marketing communications via text messages**, we do so in compliance with the Telephone Consumer Protection Act (TCPA) and based on your prior express consent (if and to the extent required by TCPA). You may revoke this consent at any time by opting-out of receiving any marketing-related communication via text messages by completing and submitting the Privacy Rights Request Form on our website. Brighter Dawn Medical does not send marketing-related text-messages to any telephone number registered with the National Do Not Call Registry (Registry). For additional information on the Registry, or to register your telephone number(s) with the Registry, please see Federal Trade Commission's [National Do Not Call Registry](#) webpage. Please note that not all of our communications sent via text messages or email are for marketing purposes, and you may continue to receive service messages for our Services (like bills, transactional notices, customer service, etc.) despite you opting-out of receiving marketing- relating communications from Brighter Dawn Medical.

Brighter Dawn Medical does not sell or share any of your Personal Information, including your mobile phone number, to any third party for marketing or promotional purposes without your express consent, except when legally required to do so. In addition, Brighter Dawn Medical does not share your consent with third parties, if and to the extent you provided consent to Brighter Dawn Medical for receiving communications via text messages.

7. Information Collected Automatically

We collect certain information about you automatically as you navigate through or use our website or Services. This information may include: (1) usage details, such as details of your visits to our website, including traffic data, location, logs, referring/exit pages, date and time of your visit to or use of our website, error information, and other communication data and the resources that you access and use on or in the website; (2) device information, such as information about your computer, mobile device, and Internet connection, specifically your IP address, operating system, browser type, and App version information; and (3) location data, if and to the extent you use a mobile device to access our website or download any of our application(s); provided however that you may disable this functionality at any time on your mobile device by removing permission for Brighter Dawn Medical to use location services.

We may automatically collect the foregoing categories of information using the following technologies:

1. **Cookies.** When you visit our website, Brighter Dawn Medical may place a cookie (a text file containing a randomly assigned number) on your device so that we have the ability to customize the look and feel of the website for you. Cookies remember information about you, your preferences, and your device for a better user experience when visiting the website. Using cookies, we may also collect a variety of other information regarding your usage of the website, including your Internet protocol address, username, session identification, browser you are using, web pages you view and referring web pages, when you access the website, and general online behavior for performance and marketing purposes. You may decline to accept cookies by modifying your web browser settings. If you choose so, however, you may be unable to use some or all functions of the website, or the website may operate less efficiently.
2. **Web Beacons.** Some pages on our website, or our e-mails, may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
3. **Google Analytics.** We may use Google Analytics and similar technologies to analyze how our website is used to assist us in the improvement and optimization of our website. These services track and examine website activities to prepare usage reports. To prevent Google Analytics from using your information for analytics, you may opt out of the Google Analytics service with the Google's Browser Add-on that's available at <https://tools.google.com/dlpage/gaoptout/>.

8. Privacy Rights

Depending on the Personal Information that Brighter Dawn Medical has about you, and depending on the manner in which we process your Personal Information, you may have the



following privacy rights related to our processing of your Personal Information. **Please note that these rights do not apply with respect to your PHI that we process. The rights that you have with respect to your PHI are more fully described in our HIPAA Notice of Privacy Practices.**

- Be informed about how your Personal Information is being processed, the categories of Personal Information being processed, and the categories of sources from which your Personal Information has been collected
- Be informed about whether and how your Personal Information being processed is being disclosed to unaffiliated third parties, and which categories of your Personal Information are being disclosed to unaffiliated third parties
- Access or receive a copy of your Personal Information
- Rectify, update or correct inaccurate or incomplete Personal Information about you
- Erasure or deletion of certain categories of your Personal Information
- Object and opt-out of processing of your Personal Information
- Limit processing of your Personal Information
- Portability of your Personal Information in a commonly used format
- Withdrawal of your consent to processing of your Personal Information to the extent such processing is based on your consent, provided that such withdrawal will not affect the lawfulness of Brighter Dawn Medical's use of your Personal Information before such withdrawal
- Non-discrimination for exercising your privacy rights

To make a request concerning these rights, please complete and submit the Privacy Rights Request Form on our website. We will confirm receipt of all such complete Privacy Rights Request Forms within 10 days of receipt. We will substantively respond to all such requests within 30 days, subject to any lawful extension of that period. Additionally, there may be a delay in processing a request while we verify that the request is valid and originates from you as opposed to an unauthorized person.

Please be aware there may be valid reasons to refuse a request, including legal and regulatory requirements that we retain and process certain information. Also, please be aware that certain requests may limit or prevent us from providing Services to you. In those situations, we will notify you in writing within 30 days. You may also contact our Data Privacy Officer for help with those situations.

Brighter Dawn Medical will not discriminate against you if you exercise any of the foregoing rights or any other rights under Data Privacy Laws, including, by not denying Services to you, not providing a different level or quality of Services to you, and not suggesting that you will receive a different level or quality of Services.

9. Selling, Share, Trading, Exchanging and Brokering Personal Information

Except as otherwise disclosed in this Policy, Brighter Dawn Medical does not sell, share, trade, or exchange Personal Information (including as those terms are defined and used in Data Privacy Laws) in any way, including for itself, or any unaffiliated third party. If and to the extent you



want to opt- out of the sale, sharing, trading, or exchanging of your Personal Information, please complete and submit the Privacy Rights Request Form on our website, and we will address such requests as described in the foregoing section of this Policy.

10. Automated Decision Making

Brighter Dawn Medical does not use automated decision making or profiling in the processing of your Personal Information, and does not make decisions that affect you based on automated decision making or profiling using your Personal Information.

11. Duration of Retention

Because the Services that Brighter Dawn Medical provides to you vary significantly, the duration we retain Personal Information varies significantly, depending on the types of Services that Brighter Dawn Medical provides to you, the duration and depth of Brighter Dawn Medical's relationship with you, and the nature of Personal Information in question. Brighter Dawn Medical endeavors to retain Personal Information that it receives from or collects for only as long as is necessary or appropriate.

12. Changes to Policy

Brighter Dawn Medical reserves the right to change or amend this Policy at any time and for any reasons, including to remain in compliance with Data Privacy Laws.

13. Questions or Concerns

For questions or concerns, please contact our Data Privacy Officer as follows:

Phone: (717) 447-2910 option 1

Email: megan@brighterdawnmedical.com

Address: 108 Roadcap Road, Millersburg, PA 17061