 Community Health Connections <i>We take great care of you!</i>	Subject: Data Privacy Policy	MedTrainer: Documents and Policies Binder\ IT + Patient Records
Original Date: August 1, 2025 Supersedes Date: Effective Date: August 1, 2025	Dept: All Site: All	

Policy:

This Privacy Notice applies to any website, application or service which references this Privacy Notice. When you provide Community Health Connection (CHC) with your personal information or when we collect it in any of the ways described in section 2 below, you agree that CHC may collect, store and use it: (a) in order to perform our contractual obligations to you; (b) based on our legitimate interests for processing, i.e. for internal administrative purposes, data analytics and benchmarking (see section 3 below for more information), direct marketing, maintaining automated back-up systems or for the detection or prevention of crime); or (c) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

1. Who we are

This Privacy Notice applies to all products, applications and services offered by Community Health Connections (CHC) whose registered office address is 326 Nichols Road, Fitchburg Massachusetts and its affiliates, but excludes any products, applications or services that have separate privacy notices which do not incorporate this Privacy Notice.

2. How we collect information

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:


- Register to use our websites, applications or services; this may include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information.

Use our applications, which may include the collection of metadata;


4. Sharing your information

We may share your information with:

- any company within Community Health Connections for the purposes set out in this Privacy Notice, which includes: global information and customer relationship management; software and service compatibility and improvements; and to provide you with any information, applications, products or services that you have requested;

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- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf, including internet service and platform providers, payment processing providers and those organizations we engage to help us send communications to you so that they may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you. We have contracts in place with them. This means that they cannot do anything with your personal data unless we instruct them to do so. They will hold it securely and only retain it for the period we instruct them to;
- other entities may also be controllers of the data we share with them. For example, we may collaborate with academic or research organizations to perform public interest research or as necessary for our own or another organization's legitimate interests, e.g. to deliver valuable insights to our customers or to enable us to improve the service we offer you. In such a case, we will take additional steps to protect your personal data, including pseudonymization, anonymization or aggregation, before sharing these data. We do this in order to protect the privacy and confidentiality of your data;
- partners, including system implementers, resellers, value-added resellers, independent software vendors and developers that may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;
- third parties used to facilitate payment transactions, such as clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- third parties where you have a relationship with that third party, such as social media providers for example, for targeted advertising purposes;
- third parties for marketing purposes, e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organizations, such as banks, insurers, finance providers, payment solutions providers, software and services providers that provide business solutions;
- credit bureaus and fraud prevention agencies;
- Any government body, regulator or other third party necessary in order to meet Community Health Connections legal and regulatory obligations;
- law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);

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- any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- our own and CHC professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- another organization if we buy or sell (or negotiate to buy or sell) any business or assets;
- another organization to whom we may transfer our agreement with you; and
- Government entities where reporting is mandatory under applicable law(s).

We may publicly share non-personally identifiable information (non-PII) about the use of our website, applications, products or services or with third parties; this will not include any personally identifiable information (PII).

5. Marketing


From time to time, we may use your information to contact you with details about our applications, products and services that we think may be of interest to you. We may also share your information with our group companies and carefully selected third parties so that they (or we) may contact you with information about their products or services that we think may be of interest to you. We or they may wish to contact you for this purpose by telephone, mail, SMS or email. You have the right at any time to stop us from contacting you for marketing purposes. You may also request at any time that we do not share your information with third parties referred to in this paragraph. If you wish to exercise these rights, you can do so by selecting your contact preferences at the time you provide us with your information on our websites, applications or services and by using any of our accessible preference centers. You may also do so by sending us an email at communications@chcfhc.org

. You may also opt-out from all marketing emails by using the links provided in these emails.

Third party platform advertising

When you respond to communications we post on third-party platforms such as LinkedIn, Instagram, Facebook, Google and Twitter, we may also share your information with third parties in order to serve targeted advertising and/or content to you via the relevant third party platform based on your profile and/or interests. Your information is used by the third party platform provider to identify your account and target advertisements to you. You can control which advertisements you see via the privacy settings on the relevant provider's platform and we recommend that you consult the third party's help or support center for further information.

We use Conversion APIs provided by Meta, Google and LinkedIn to ensure our ads match your potential interest, to track their efficiency and to optimize the effectiveness of our campaigns. An API is a software intermediary

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allowing two applications to talk to each other, when using a conversion API, we allow our server to communicate with these third-party servers. Where you consent to “Targeting technologies” on our website, we collect information about your usage of our website from our server logs and share this information with these third parties for the abovementioned purposes. We also share what we call “offline” data, which is information we collected from our interactions with you that took place outside of our website and can help us understanding your entire experience with CHC. This data includes your hashed contact details, as well as information about your organization and information about your interactions with Sage (e.g. whether you are interested in a product, which product it is, how interested you are). You can deactivate this tool by withdrawing your consent to “Targeting technologies”.


6. Your information and your rights

- the right to be told how we use your information and obtain access to your information;
- the right to have your information rectified or erased or place restrictions on processing your information;
- the right to object to the processing of your information, e.g. for direct marketing purposes or where the processing is based on our legitimate interests;
- the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, when technically feasible (“data portability”);
- where the processing of your information is based on your consent and the right to withdraw that consent is subject to legal or contractual restrictions;
- the right to object to any decisions based on the automated processing of your personal data, including profiling; and
- the right to lodge a complaint with the appropriate authority responsible for data protection matters.

If we hold any information about you that is incorrect or if there have been changes to your information, please let us know so that we are able to keep our records accurate and up to date.

If you withdraw your consent to the use of your personal information for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our website, applications and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes in accordance with CHC Data Retention,

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Marking and Destruction Policy or otherwise as permitted by applicable laws and regulations. When we no longer need your personal information, we will dispose of it in a secure manner without further notice to you.

7. Changes to our Privacy Notice

We may change this Privacy Notice from time to time. However, we will not diminish your rights under this Privacy Notice. We will always update this Privacy Notice on our website, so please review this when you visit our website. The "last updated" mention lets you know when we last updated this Privacy Notice.

8. Security and storage of information

We will keep your information secure by taking appropriate technical and organizational measures against its unauthorized or unlawful processing and against its accidental loss, destruction or damage. We will do our utmost to protect your personal information, though we cannot guarantee the security of your information transmitted to our website, applications or services, as well as to other websites, applications and services via the internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services, please keep this password safe – we will not share this password with anyone.

9. Other sites and social media

When clicking on and following an external link via our website, application or service to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy notices appearing on those websites or services.

Our websites, applications or services may enable you to share information on social media sites, use social media sites to create your account or to connect with your social media account. These social media sites may automatically provide us with access to certain personal information that they have already collected. For example, this may apply to content you may have already viewed on their platforms. You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

10. Cookies, analytics and traffic data

If you follow a link which takes you away from our website, our privacy notice does not apply when you arrive at your new online destination, and we are not responsible for the handling of your personal data after you have left our website. Please read the privacy information of the third party responsible for the new online location which you have linked to.



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Approved by:

CIO

Date:

8/1/2025

Approved by:

CQCO

Date:

8/1/2025

Approved by:

COO

Date:

8/1/2025