

# Facts about your personal information

## Why do we provide you with this information?

We provide this information because we want you to clearly understand [Vendor]’s policies, practices, and procedures for using, securing, and protecting the personal information in your PHR. The table below provides you a snapshot. You can link to more detailed information by clicking on any of the areas below.

PHR Facts At-A-Glance		Our Practices
<b>PHR Type</b>	<b>Provided by</b>	
	<b>Fee</b>	
<b>Who can view your personal information?</b>	<b>You</b>	
	<b>Family and friends</b>	
	<b>Healthcare providers</b>	
	<b>Insurers</b>	
	<b>Employers</b>	
	<b>Pharmacies</b>	
	<b>Additional health programs and services</b>	
	<b>[Vendor]</b>	
	<b>Others</b>	
<b>How may we use your personal information?</b>	<b>For [Vendor]’s business practices</b>	
	<b>For marketing</b>	
	<b>For medical research</b>	
	<b>For selling to others</b>	
	<b>For legal reasons</b>	
<b>What are our policies about closing your PHR?</b>	<b>Ability to close PHR</b>	
	<b>Data retention by [Vendor]</b>	
	<b>Ability to transfer to another PHR</b>	
<b>When will you be notified?</b>	<b>If [Vendor] is sold/merged/out of business</b>	
	<b>If there is a change in these policies</b>	
	<b>If there is a security breach</b>	
<b>How do we store and protect your personal information?</b>	<b>Geographic location of data storage</b>	
	<b>Logs of all PHR views for customer review</b>	
<b>Full printable version</b>		
<b>Contact information</b>		

## Facts about your personal information

### What is personal information?

You store personal information in your PHR as a way to help better manage your health. Personal information is information about you that includes contact information, demographic information, health information, and financial information. Examples are listed below:

**Contact Information** (e.g., for use in the event of an emergency or to speed up registering with a new physician)

- name
- address
- email address
- phone number
- social security number
- emergency contact

**Demographic Information** (e.g., to inform your physician of potential risk factors)

- age
- gender
- ethnicity
- occupation

**Health Information** (e.g., to better manage a health condition)

- medical conditions
- medications (over-the-counter and prescription)
- lab/test results
- doctor's contact information
- immunizations
- disease management charts
- injury management

**Financial Information** (e.g., to keep track of your health care expenses)

- healthcare bills
- health insurance
- healthcare savings account (HSA) information

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## What PHR type are we?

[Vendor] is a \_\_\_\_\_. Knowing the PHR type we provide will help you understand our policies, practices, and procedures.

PHR provided by	Description	Do you pay a fee?
Employer	Some large employers offer PHRs as a feature of a benefits plan. <a href="#">More...</a>	
Healthcare Provider	Some healthcare providers offer PHRs as a way to provide patients with health information from the clinicians' record. <a href="#">More...</a>	
Health Insurer (PPO or HMO)	Some health insurers offer PHRs to provide consumers with information from health insurance claims. <a href="#">More...</a>	
Independent	Some independent internet companies offer PHRs directly to consumers. Some Employers, Healthcare Providers, and Health Insurers may also have partnerships with independent internet PHR companies. <a href="#">More...</a>	

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## Who can view your personal information?

When you set up your PHR, you may be able to give permission to certain people or groups to view some or all of your personal information.

	Can they view information?	Can they add information?	Can they edit information?
Your health partners			
You (PHR customer)			
Your family and friends			
Your healthcare providers			
Your health insurer			
Your employer			
Your pharmacy			
Additional <u>health programs and services</u>			
[Vendor]			
[Vendor] and its employees			
Companies doing work for [Vendor] to operate and manage the systems			
[Vendor]'s business and advertising partners			
Others			
Law enforcement for legal investigations			
Government for national security			
The public (through chat rooms and forums)			

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You (PHR customer)			
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Your pharmacy			
Additional <u>health programs and services</u>			
[Vendor]			
[Vendor] and its employees			
Companies doing work for [Vendor] to operate and manage the systems			
[Vendor]'s business and advertising partners			
Others			
Law enforcement for legal investigations			
Government for national security			
The public (through chat rooms and forums)			

Some examples of additional health programs and services that work with the PHR include fitness activity journals, weight loss programs, and glucose monitoring services.

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## How may we use your personal information?

[Vendor] uses the personal information in your PHR for certain reasons.

Common uses of personal information in a PHR	Does [Vendor] do this?	Can you opt out?
For you and your health needs		
Process exchanges between your PHR and healthcare providers		
Process exchanges between your PHR and labs, pharmacists, health plans, etc.		
[Vendor]'s everyday business practices		
Communicate with you		
Maintain and improve [Vendor]'s PHR systems		
Manage [Vendor]'s security systems (such as against spam, misuse, and criminal activity)		
[Vendor]'s marketing purposes – to offer our health-related products and services to you		
[Vendor]'s marketing purposes – to offer our non-health-related products and services to you		
Sharing and selling for marketing		
Your <u>personal information</u> to our business and advertising partners		
<u>Anonymized information</u> to our business and advertising partners		
<u>Anonymized information</u> for [Vendor] to market itself to business partners		
Sharing and selling for medical research		
Your <u>personal information</u> for medical and public health research		
<u>Anonymized information</u> for medical and public health research		
<a href="#">Click here for more about our sharing and selling</a>		
For legal reasons		
Comply with subpoenas, court orders, and search warrants		

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## How may we use your personal information?

[Vendor] uses the personal information in your PHR for certain reasons.

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Common uses of personal information in a PHR	Does [Vendor] do this?	Can you opt out?
For you and your health needs		
Process exchanges between your PHR and healthcare providers		
Process exchanges between your PHR and labs, pharmacists, health plans, etc.		
[Vendor]'s everyday business practices		
Communicate with you		
Maintain and improve [Vendor]'s PHR systems		
Manage [Vendor]'s security systems (such as against spam, misuse, and criminal activity)		
[Vendor]'s marketing purposes – to offer our health-related products and services to you		
[Vendor]'s marketing purposes – to offer our non-health-related products and services to you		
Sharing and selling for marketing		
Your <u>personal information</u> to our business and advertising partners		
<u>Anonymized information</u> to our business and advertising partners		
<u>Anonymized information</u> for [Vendor] to market itself to business partners		
Sharing and selling for medical research		
Your <u>personal information</u> for medical and public health research		
<u>Anonymized information</u> for medical and public health research		
<a href="#">Click here for more about our sharing and selling</a>		
For legal reasons		
Comply with subpoenas, court orders, and search warrants		

Anonymized information does not include specific contact information or other information that may make it easy to know who you are.

{Vendor can explain sharing & selling practices in more detail}

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### What are our policies about closing your PHR?

[Vendor] has specific policies if you close your PHR.

Common closing questions	Your options
Can you close your PHR?	
Is your personal information permanently removed from [Vendor]'s systems?	
How long does [Vendor] keep your personal information?	
Will all authorized users' access be immediately terminated?	
Can you transfer your PHR data to another PHR?	

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### When will you be notified?

[Vendor] contacts you by email for certain reasons.

Reasons you may be notified	Will [Vendor] notify you?	Can you opt out?	Your options once notified
Changes to [Vendor]'s policies, practices, and procedures			
If [Vendor] is sold, merges with another company, or goes out of business.			
In the event of a security breach			
Changes to PHR services, such as new features			
Changes to the type of information available to or through your PHR			
Newsletters and optional surveys			
Marketing materials from [Vendor] and associates			

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## How do we store and protect your personal information?

[Vendor] uses physical, technical, and procedural safeguards to protect your personal information from unauthorized access or use.

Common protections of online and health information	Does [Vendor] do this?
<b>Legal protections</b>	
<i>{HIPAA Privacy and Security Rules for health information}</i>	<i>{Possible answers include: "legally required to follow HIPAA Privacy and Security Rules" or "not legally required to follow HIPAA Privacy and Security Rules"}</i>
<i>{Vendor can list other laws it must follow in additional rows.}</i>	
<b>Privacy certifications</b>	
CCHIT Certified status for health information technology	
TRUSTe certified	
<i>{Vendor can list other privacy certifications it must follow in additional rows.}</i>	
<b>Computer network and data processing protections</b>	
Log of all PHR views (audit trail) for your review	
All data processed in USA	
User ID and password	
Time-out your PHR access when your computer is idle	
<b>Data storage protections</b>	
All data storage in USA	
Geographically diverse data storage locations	
Data storage power supply redundancy, environmental controls, and a security system	

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### Contact Information

Web:

Email:

Privacy Officer:

Write:

Call:

DRAFT

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### Terminology

This page will eventually have definitions for words that require further explanation



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