

# Privacy Policy

## Purpose

The purpose of the SDS Privacy Policy is to notify users of the practices regarding the collection, use, sharing, choices, security and correction options around information collected or maintained about them.

## Audience

The SDS Privacy Policy applies to users who have information collected via interactive web portal usage, automated web API usage, and file trading.

## Policy

### Notice

- We only collect information that you voluntarily share via this website, email or other direct contact.
- We will not sell or rent this information to anyone.

### Purpose

- We will use your information to respond to you based on the reason you contacted us.
- We only share your information with authorized business partners as it relates to processes related to your request.
- We may contact you for company-related messaging; you have the ability to request not to receive these communications.

### Consent

- We will not voluntarily share your information with a third party without prior authorization, except:
  - With an affiliate or agent of SDS,
  - With written authorization,
  - To enforce our privacy policy, to comply with law, regulation or other legal processes or to protect the rights, property or safety of us or others,
  - With a regulator or law enforcement agency or personnel,
  - In emergency situations,
  - To protect against misuse or unauthorized use of SDS information systems,
  - To detect or prevent criminal activity or fraud, or
  - In the event that we or substantially all of our assets are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, in which case information may be one of the transferred assets.

## Ownership and Rights

Protected information belongs to the customer or business partner from which it originated. SDS makes no claim of ownership once the data has been imported into our systems.

You have the following rights and expectations with regard to protected information that SDS holds:

- At any time, upon authorized request, SDS will purge all or part of any protected information from all of its systems.
- At any time, upon authorized request, SDS will export all or part of any protected information from its systems for transmission back to its owner.
- At any time, upon authorized request, you may alter or amend how SDS is authorized to use and process your information.

## Security

- We take precautions to protect your information both online and offline.
- SDS has implemented physical, administrative and technical safeguards and operational procedures to protect information we collect and/or maintain.
- Transactions over the internet involving information are encrypted.
- We restrict access to your information in our database to authorized users.

## Access

- You may opt out of communication with us at any time.
- You can contact us via e-mail or phone to:
  - Find out what data we maintain about you, if any.
  - Change/correct any data we have about you.
  - Have us delete any data we have about you.

## Accountability

- SDS has appointed a Privacy Officer and Security Officer who are responsible for the protection of information.
- SDS is committed to resolving any complaints about your privacy and our collection or use of your personal information. If you have any questions or complaints regarding this policy, please contact us via email or phone.

## HIPAA

- Some personal health information we collect may be protected health information ("PHI") within the meaning of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). To the extent applicable, SDS agrees to comply with HIPAA and the rules issued pursuant to HIPAA.

## Cookies

- We collect information about you and your use of SDS web applications through the use of cookies. Cookies are small files that a website can store on your computer's hard

drive for record-keeping or other administrative purposes. SDS uses cookies solely to maintain user sessions on its web applications. Disabling cookies in a browser will render SDS web applications non-accessible to that browser.

## Links

- This Website includes links to other websites. This Privacy Policy does not apply to these links.
- We do not endorse and are not responsible for the operation or content of these websites. Please consult the privacy policy for each website you visit.

## Updates

- We may modify, alter or update our privacy policy at any time, so we encourage you to review our privacy policy frequently.
- We will not provide individual notice to you of changes to our privacy policy, but when we make updates to our privacy policy, we will update the date in this section.
- If you feel that we are not abiding by this privacy policy, you should contact us immediately at phone or e-mail.

## Disclosure

The following information is collected by SDS:

- Personal Healthcare Information
  - Entire health care claims
  - Other medical records
  - Health insurance eligibility demographic and benefit data
  - Health care payment data
- Proprietary business logic and/or data tables
- Business correspondence
- IP address and browser user agent information

## Contact Information

Smart Data Solutions  
960 Blue Gentian Rd  
Eagan, MN 55121

Kristine Burke  
[kburke@sdata.us](mailto:kburke@sdata.us)  
651-894-6420

Our Privacy Policy was last updated on 7/23/2022.

## Exceptions

Exceptions from certain policy provisions may be sought following the SDS Exception Process.

## Enforcement

Personnel found to have violated this policy may be subject to disciplinary action, up to and including termination of employment, and related civil or criminal penalties.

Any vendor, consultant, or contractor found to have violated this policy may be subject to sanctions up to and including removal of access rights, termination of contract(s), and related civil or criminal penalties.

## Version History

Version	Modified Date	Approved Date	Author	Reason/Comments
1.0.0	April 2020	4/22/2020	SDS	Document Origination
1.0.1	April 2021	4/27/2021	Patrick Bores, CIO	Annual Review
1.0.2	July 2022		Patrick Bores, CIO	Annual Review