

## Privacy Statement

***Southwoods Health (“Southwoods”) values your privacy. In this Privacy Statement, “Southwoods”, “we”, “our” or “us” refers to Southwoods Health, through our healthcare entities, The Surgery Center at Southwoods, LLC d.b.a. The Surgical Hospital at Southwoods and its affiliates, Triad Health Services, LLC and Southwoods Anesthesia, LLC d.b.a. Southwoods Physician Services. This Privacy Statement governs the use of your data on the Southwoodshealth.com website when it is not considered Protected Health Information (“PHI”) as defined under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). HIPAA laws provide their own protection for PHI which can be viewed on Southwoodshealth.com site under our “HIPAA Policy”. For the avoidance of doubt, the personal information collected by some areas of the Site such as the Communications Sign-Up may also be protected by our HIPAA Policy. In the event of any conflict between this Privacy Statement and the HIPAA Policy, the HIPAA Policy prevails.***

This Privacy Statement of Southwoods outlines how your personally identifiable information and other personal data (your “User Information”) will be collected, used, and shared in connection with your access to and/or use of Southwoodshealth.com and any content, features, services, or other offerings that Southwoods may provide in connection therewith (collectively, the “Site”), as well as what information about you we collect through any application on third party sites, social network or social media sites operated by Facebook, Instagram, Twitter, Google, etc. (the “Applications”). This Privacy Statement also describes your choices and rights regarding the use, access and correction or deletion of your User Information. By using the Site, you consent to the use of your User Information in accordance with this Privacy Statement. The Site is owned and operated by Southwoods.

Southwoods does not operate in, actively target, or market to any European Union (EU) member state and does not, to its knowledge, process or control any EU citizen personally identifiable information.

### **Summary of Terms**

To enhance, personalize, and support your experience on the Site, among other things, we may collect, use, and share your User Information. For example, we use aggregated information to develop content targeted to user interests and to generally improve the Site's user experience. As detailed below, your User Information may also be used by Southwoods and its partners to tailor content, provide social media features (e.g., features that allow you to share content directly to your preferred social media platform), track your preferences, analyze traffic, and provide similar services and content. Southwoods is committed to your privacy and will not share any User Information with any third party without your consent, except as outlined in this Privacy Statement or as permitted by law. If you have any requests, comments, or questions about this Privacy Statement or your User Information, please contact us in the manner provided below.

### **Children’s Online Privacy Information**

***The Site is intended for people who are at least 13 years of age.***

If you are less than 13 years old, please do not use or provide any User Information to us--including information such as your name, address, or e-mail address or use any interactive or feedback features of our Site or otherwise provide any information to us about you. We do not knowingly collect (nor do we wish to collect) any personally identifiable information or other User Information from children under the age of 13. If we learn we have collected any personal information from a child under the age of 13 without verification of parental consent, we will delete that information from our database and terminate the corresponding account, if any. If you believe we might have any information from or about a child under 13 without such parental consent, please contact us as outlined below. We encourage you to discuss the Site with your parent or guardian.

If we change our collection practices for children under the age of 13 in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from children. If at any time we establish or begin providing services on the Site that in anyway meets the criteria of Children’s Online Privacy Protection Act (“COPPA”) we will ensure that full compliance is met in every aspect of COPPA.

Due to the fact we do NOT collect any personally identifiable information from children under the age of 13 we also do NOT knowingly distribute such information to any third parties.

### **Application Policies**

This Privacy Statement covers this Site. Your use of social media or social network sites or applications such as Facebook, Instagram, Twitter, Google, etc. in general and your relationship with those third-party applications are subject to each application’s own privacy policy and other terms and policies, which we strongly recommend that you review. We do not control and are not responsible for how third-party applications process your information or data.

### **Third Party Links**

This Privacy Statement covers this Site. Southwoodshealth.com may contain links to sites owned and operated by unaffiliated third parties. These links are provided as a service to you as a customer and do not constitute Southwoods’ endorsement or support of the third-party sites or the information or content contained within the third-party sites. Related services and offerings with links from this Site, have their own privacy statements that can be viewed by clicking on the corresponding links within each respective site. We recommend and encourage that you always review the privacy policies of any third parties before you provide any personal information or complete any transaction with such parties. Please contact each third-party provider directly if you have any questions about their privacy policies or the information they require for you to complete any transaction.

### **Analytics and Advertising Services**

This Site uses Web Analytics Service Providers, including Google Analytics (“Google”), which transmit website traffic data to Google servers in the United States as well as may provide targeted advertising features. Google does not collect personal information, identify individual users, or associate your IP address with any other data held by Google. We do not share any User Information with Google in connection with their performing of any services on the Site. We use reports provided by Google to help us understand website traffic and webpage usage. You may opt out by installing the Google Analytics opt out browser add on found [here](#). Furthermore, if you do not want to use any remarketing advertising feature from Google on this Site you can disable it by changing the appropriate settings within Googles Ad Settings Manager found [here](#). We also use the services of our third-party service providers to generate similar website traffic data under specific agreements with such parties.

### **General Information We Collect and How We Use It**

**SECTION OVERVIEW:** We collect User Information when you use the Site. Sometimes you may submit it to us yourself, other times it may be collected automatically. You can manage and change your preferences as outlined below.

#### ***Information Collected***

When you use the Site, your User Information may be collected, used, and shared in a variety of manners. As detailed below, the type of User Information collected may vary based on how it was gathered, but may include, among other things, your name, address, phone number and other registration information that you voluntarily submit (e.g., when you sign up to receive our communications emails), and information automatically collected about your usage of the Site which does not include personally identifiable information (e.g., the content that you choose to view).

Except for users accessing the patient portal or paying their bills online within secure sections of the Site, which data is covered by our HIPAA Privacy Notice, Southwoods does not collect or process any data based upon the following: Race or ethnic origin; political opinions; religious or philosophical beliefs; trade union memberships; genetic or biometric data; health or mortality; sexual orientation.

### ***Voluntary Submission***

Southwoods may collect User Information that is voluntarily provided by you or with your permission and may include links to third party sites to enter such User Information. For example, we may ask you for information, such as your username and password when you log in to the patient portal. (See the Section below regarding To Provide Interaction Communications from the Site for more information about how we use this information.) We may also re-post client testimonials on the Site which have been posted voluntarily on our Site. We will not disclose your full name, and instead use first names with cities (for example, “John from Boardman.”). You always have the option not to provide the information we request. If you choose not to provide the information we request, you can still visit the Site, but you may be required to call our office and provide your information by other means. When you provide information to Southwoods in any other manner, you agree to provide only true, accurate, current, and complete information.

### **Cookies**

A cookie is a small data file that is written to your computer's hard drive by your web browser. A cookie file can contain and/or automatically collect information, such as a user identification code or IP address that a website will use to track the pages and number of times you have visited. The data read from these cookies may be linked to personally identifying (PII) and non-personally identifying (non-PII) information.

We may use cookies and similar technologies on the Site to personalize and optimize your browsing experience and the Site by: enabling social media features, safeguarding against spam and malware, analyzing trends, traffic, and user behavior, administering the website, gathering demographic information about our user base as a whole, tracking web and advertising analytics throughout the Site and its affiliate websites, remembering your preferences and voluntarily-submitted information, performing location-related functionalities and analytics, participating in market research (e.g., website ratings), and educating ourselves about how we can continue to improve the Site and its various elements.

### **Cookies fall into the subcategories below.**

***Essential Cookies.*** Certain cookies are used for specific purposes that are essential to your secure use and navigation of the Site. Without them, Southwoods may not be able to provide core Site functions and features to you, and the Site would not operate as well as you or Southwoods would like. These cookies collect and use information such as your server preferences, single-session data and corresponding identifier, web beacons and log files (detailed below), and other credential-related information. Essential cookies also help inform Southwoods whether you require, or have already been served, proper notice in connection with our data policies. Essential cookies also include analytics cookies, which provide us data that allows Southwoods to better understand its users and improve the Site based on what we have learned from that data.

***Preference Cookies.*** Other cookies are used to collect and process information about your preferences and similar choices in connection with the Site to optimize your browsing experience. Preference cookies include social media cookies, which collect information about

your social media usage and other data you may have provided in connection with such usage (if you access the Site through a social media website or mobile application, you may have social media cookies). If you wish to modify or change your social media cookies, please visit and review the settings related to your applicable social media account(s).

**Advertising Cookies.** To further tailor your experience, Southwoods and certain of its third-party providers may also use cookies on the Site to personalize the content you may be shown. Some advertisements may use advertising cookies to provide targeted advertisements that may be more consistent with your interests than non-targeted advertisements. Southwoods does not provide user information to third parties except in connection with the Site or as required by law.

**NOTE:** You can accept or decline cookies by changing certain settings of your web browser. Most web browsers automatically accept cookies, but generally allow users to modify their browser settings to display a warning before accepting a cookie, to accept cookies only from certain websites, and/or to refuse all cookies. We encourage you to consider keeping your cookies enabled, as if you choose to disable cookies from our Site, you may not be able to use or benefit from certain features of the Site, particularly the features that are designed to personalize your experience.

### **Web Beacons**

Southwoods' web pages may contain electronic images known as web beacons (invisible images often referred to as pixel tags or clear GIFs) on our sites in order to recognize users, assess traffic patterns, identify preferred content and measure site engagement.

Some of these web beacons may also be placed by third-party service providers or Applications to help determine the effectiveness of advertising campaigns. These web beacons may be used by third-party service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages and compile anonymous information in relation to those page views, which in turn enables us and our third-party service providers to learn which advertisements bring you to our website and how you use the site.

Southwoods also may use web beacons to collect various data provided by your browser while you are on our Site and elsewhere (i.e., outside of the Site) where we may be acting as a 3rd party. This data is collected in the aggregate but may include or be associated with other User Information that users have voluntarily submitted.

### **Log Files**

The Site's web servers log information about a user's IP address, browser type and the current URL the user is requesting. This information is always provided by a user's browser and automatically logged by most websites. These log files are stored in a secure location and used in our internal analysis of traffic patterns within our website.

### **Use of Your Information**

Our primary goal in collecting, using, and sharing User Information is to enhance your experience on the Site, support the Site, and improve its features, performance, and other elements. Your User Information may be used for the purposes outlined below. We will not use your User Information without a valid legal basis to do so.

#### ***To Target Content***

To develop and provide content to you that is targeted to your interests, we use the analytics collected by the systems described above to determine which areas of our Site you prefer based upon the frequency of your visits and engagement with those areas. We may make reasonable

assumptions based on your browser-provided data to target relevant content to you on our Site and elsewhere where we may be acting as a 3rd party. We may also make reasonable geographic and demographic assumptions based on your presented IP address to target relevant content and advertising.

### ***To Provide Interactive Communications from the Site***

The Site contains links to our patient portal and an online bill pay portal. In both instances, the login information required to enter these third-party sites is collected using a secure platform. We have contractual arrangements with these third parties to provide these services on our behalf and to follow appropriate security safeguards in providing such service.

### ***To Provide Communications from Third Parties***

We respect the privacy of our users and will not disclose or distribute our user information to any third party without an express written agreement to provide such services, nor will we permit anyone else to do so.

### ***Sharing of Information***

You may be requested to voluntarily provide certain User Information during your use of the Site. If you choose to do so, that User Information may be shared with Southwoods as well as business partners and vendors providing hosting and other services for Southwoods.

### ***As Necessary to Provide Services to You***

We may occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of appointment reminders, processing certain payment transactions, or performing statistical analysis of our services. We will only provide those companies the information they need to deliver the service. In some instances, these companies may collect information directly from you. In all cases, these companies are subject to agreements that require them to maintain the confidentiality of your information and they are prohibited from using that information for any other purpose.

### ***Payment Card Industry Data Security Standard (PCI-DSS)***

With respect to credit card processing, we do not collect, store, or process any credit card information. We currently accept VISA, MasterCard, Discover, and American Express credit cards as authorized payment methods for billing purposes for payment of your account with us. All payment transactions are processed by our third-party payment processor in adherence to PCI-DSS, and other applicable standards. Southwoods in its sole election may discontinue support for any payment method or it may support additional payment methods in the future.

### ***In the Event of Sale or Bankruptcy***

The ownership of the Site may change at some point in the future. Should that occur, we want this Site to be able to maintain a relationship with you. In the event of a sale, merger, bankruptcy or other change in control of Southwoods, your non-PHI information may be shared with the person or business that owns or controls this site. (Note: Your patient information and medical record will not be shared without your permission and only according to the terms of our HIPAA Policy.) Opting out of receiving information from third parties will not affect our right to transfer your information to a new owner, but your choices will continue to be respected regarding the use of your information.

### ***As Required By Law***

Southwoods may disclose your personal information if required to do so by law such as to comply with a subpoena or in the good faith belief that such action is necessary to conform to the edicts of the law, protect your safety or the safety of others, investigate fraud or comply with a judicial proceeding, court order or legal process served on Southwoods or to protect and defend the rights or property of

Southwoods.

Southwoods will not process your User Information without a lawful basis to do so. In general, Southwoods will process your User Information on any of the following legal bases:

- **Consent:** We may process your User Information if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your User Information when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your User Information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

### **How We Protect Your Information**

Southwoods may store and process Personally Identifying Information collected on our Site on our own servers or on the servers of our business partners, including any hosting services. Paper copies containing all or part of the Personally Identifying Information you supply to us may be made and kept in file cabinets as part of the course of normal business activity. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect. We use secure online certificates for our domain. When entering personal information, look for the secure icon and https designation in the address box of your browser window that indicates you are on a secure page. We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access to your Personally Identifying Information to employees who need to know that information in order to perform their jobs and provide service to you.

We care about the protection of your User Information and use industry standard safeguards to do so. Of course, it's important to keep in mind that no data transmission on the Internet is guaranteed to be 100% secure.

We use industry standard physical, electronic, and organizational safeguards to protect your User Information against loss or theft as well as unauthorized access and disclosure to protect your privacy. We employ many different security techniques to protect such data from unauthorized access by users inside and outside the company. However, it must be noted that "perfect security" does not exist on the Internet. If you are concerned that your privacy may have been breached, please contact us as provided below.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Site.

### **Residents of California**

The California Consumer Privacy Act ("CCPA") provides California residents with specific rights as to the privacy and management of their User Information. Southwoods collects certain, limited personal information from you in connection with your use of the Site. This information includes (i) your name

and e-mail address, but only if you voluntarily provide this information in connection with a request to receive Southwoods' electronic communications; (ii) information related to Web Beacons; (iii) information related to Log Files; and, (iv) information related to Google Analytics Services. This information is used by Southwoods for the purposes set forth in this Privacy Policy.

Southwoods does not sell any personal information it collects about you to third parties. Southwoods shares information related to Log Files, Web Beacons, and Analytic Services with third parties in connection with maintaining and improving the Site.

If you are a resident of California, under the CCPA, you have the right to:

- Request Southwoods disclose the categories and specific information that it has collected about you;
- Request Southwoods delete any personal information about you that it has collected;
- Request Southwoods not share your personal information at any time (the "right to opt-out");
- Request Southwoods correct any inaccurate personal information it maintains about you; and
- Request Southwoods restrict its use and disclosure of your sensitive personal information.

If you would like to exercise your rights under the CCPA, you may contact us as outlined below. If you choose to exercise your rights under CCPA, you will not be discriminated against by us for choosing to do so.

### **Changes to Privacy Statement**

If we make any material changes we will notify you by means of a notice on this website. We encourage you to periodically review this page for the latest information on our privacy practices.

### **Contacting Data Controller**

If you have any questions regarding this Privacy Statement, please feel free to contact us at the mailing address below:

#### **Southwoods Health**

Attention: Marketing  
7630 Southern Blvd.  
Boardman, Ohio 44512

Or by email: [tech@southwoodshealth.com](mailto:tech@southwoodshealth.com)

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