

Website Privacy Policy

Last reviewed January 29, 2024

Welia Health (“we,” “us,” “Welia Health”) respects privacy and is committed to protecting personal information. This Privacy Policy (“Policy”) explains our practices for handling information we may collect and use about website visitors and users and applies to information you provide to us through access and use of our website located at weliahealth.org (the “website” or “site”). This Policy describes the types of personal information we may receive, how we may use and disclose the information, and certain rights and options individuals may have regarding their information. Please review this Policy carefully.

OUR NOTICE OF PRIVACY PRACTICES GOVERNS OUR USE AND DISCLOSURE OF PERSONAL HEALTH INFORMATION AND OTHER DATA. PLEASE REVIEW THAT DOCUMENT TO LEARN MORE.

Your Consent. By using this Site, you are consenting to the collection, use, disclosure, and transfer of your information as described in this Policy (and any Privacy Notices that apply to you). If you do not consent to the collection, use, disclosure, and transfer of your information as described in this Policy (and any Privacy Notices that apply to you), you may not use this Site. If you have questions about this Policy or any Privacy Notice, please contact us using the information provided below. If you are a Welia Health patient, please also see our Notice of Privacy Practices.

This policy is part of the Terms of Use that govern your use of this website. This Policy applies to the information we collect from or about you through this site. It does not apply to information we collect from you through other channels, such as over the phone, at our hospital, or in our clinics.

Personal Information. For the purposes of this Policy, “personal information” is any information that identifies, relates to, or can be used to contact a particular individual. The types of personal information we receive include the following categories:

- **Contact information** – first name, last name, email address, physical address, billing address, and telephone number.
- **Account and patient information** – patient ID, account username, account password, and other information that we may request or that you may provide relating to your patient account.
- **Transactional information** – details about your transactions with us, including method of payment, payments received, payment details, insurance information, transaction history, services performed, dates of services, and other information relating to your use of our services.
- **Communication information** – details regarding informational materials you may have requested or received from us, the services in which you are interested, your receipt of informational communications, information regarding your communication preferences, and copies of communications and inquiries you have submitted to us, including through email and features available on our site.
- **Device and usage information** – details regarding how and when you use our site, including the device used to connect to our site or software, your IP address and device identifier, the frequency and duration of your usage, the pages you view, what websites or search terms referred you to our website and information about your interaction with our site.

We collect this information when you visit or navigate our site, fill in forms on our site, schedule appointments or make payments on the site, communicate with us using functionality on the site, or otherwise provide us with personal information through the site.

To the extent you provide us with information about third parties, we will use it in accordance with this Policy. If you provide us with such information, you confirm that you have the consent of the third party or are otherwise entitled to share the information with us and that you have made the information in this Policy available to the third party.

Please note that we may aggregate or anonymize the foregoing types of information such that they are no longer capable of identifying you or the individual to which they relate, in which case they are no longer considered “personal information.” We may also collect information about you from third-party sources and information about you that is publicly available.

Automatically Collected Usage and Device Information. Like most websites, our site uses various technologies to automatically collect information about visitors. Those technologies include:

- **Cookies** – Cookies are small text files that a website transfers to a visitor’s device for recordkeeping purposes. We use cookies to personalize visitors’ experiences on our website, provide content that we believe may be of interest, track visitor trends and patterns, engage in marketing and advertising, and otherwise analyze our Site traffic. For further information about cookies, including how to refuse cookies, please visit www.allaboutcookies.org. Please note that if cookies are disabled, you may not be able to enjoy certain features of our site.
- **Log files and device identifiers** – We use log files to track actions occurring on the site and collect data about visitors, including IP address, browser type, Internet service provider, referring/exit pages, date/time stamps, and device identifiers.
- **Web beacons and other technologies** – Our site may use other tracking tools, including web beacons (also known as clear gifs, pixel tags, and single-pixel gifs), which are small electronic images embedded in content and email messages that are not ordinarily visible to users. Web beacons allow us to track pages and content accessed and viewed by users, as well as monitor email readership.
- **Analytics** – Our site may also use third-party analytics tools such as Google Analytics. You can find more information about how data is collected and processed in connection with the Google Analytics service here. You can also read Google’s privacy policy here.

The information collected through these technologies may be combined with personal information or aggregated with other information on site visits, including with information in our patient management system. We may share information about your use of our site with our advertising and analytics partners, who may combine it with other information that you previously provided to them.

Information from Other Sources. We may obtain both personal and non-personal information about you from business partners, service providers, and other third parties and add it to other information we have collected. For example, we may receive information from third-party mobile application service providers (e.g., RxLocal) that you access outside of our website. We, and third parties we engage, may combine information we collect from you over time, and across the site, with information obtained from other sources. This helps us improve the information’s overall accuracy and completeness and also helps us better tailor our interactions with you.

Social Media. If you interact with us on any social media platform: (a) depending on your social media privacy settings, the personal information that you submit on the social media platform may be read, collected, or used by us as described in this Policy, and (b) where we respond to any interaction with you on social media, your account name/handle may be viewable by any and all members or users of our social media accounts. Social media platforms operate independently from us, and we are not responsible for the personal information that you choose to submit or link on any social media platform. We encourage you to review the privacy policies and settings of any social media platform with which you interact to help you understand their privacy practices.

How We Use Your Information. We (or service providers acting on our behalf) generally reserve the right to use and disclose information you submit to us through this site as set forth in this Policy. Please note, however, that disclosure of protected health information submitted through this site is governed exclusively by our Notice of Privacy Practices.

We (or service providers acting on our behalf) may use the personal information identified above for the following purposes:

- Entering into and managing our relationship with you and providing services to you.
- Scheduling you for services, communicating with you and responding to your inquiries and communicating regarding our services and other issues.
- Providing and optimizing your experience on our site and ensuring that our content is presented to you in the most effective manner.
- Sending you promotional and informational communications and solicitations, tracking your communication preferences, and for our internal marketing purposes.
- Managing customer service issues, including issues relating to the performance of our services and patient feedback.
- Developing, updating, and improving our services, customer service, and customer experience, and otherwise improving our knowledge and insights regarding customers.
- Preventing and detecting fraud, financial crime, hacking activities, security breaches, and other unlawful activities in connection with the site or the use of our services.
- Enforcing our agreements, complying with our legal or regulatory obligations, and defending or advancing legal claims.
- Notifying you about changes to our site, services, or material changes to this Policy.
- Providing you with surveys or otherwise soliciting feedback from you.
- Performing other functions as otherwise described to you at the time of collection or to which you otherwise consent.

For more information about your options relating to your personal information and your communication preferences, see Choices About the Collection and Use of Personal Information below.

Disclosure of Your Information. When the information we collect about you is aggregated, anonymized, or otherwise does not identify you, we may use that information for any purpose or share it with third parties to the extent permitted by applicable law.

In addition, we may share your information with the following types of entities:

- **Third-party vendors, business partners, and service providers** – We may share your information with third-party vendors who act for us or on our behalf and assist with our business. For example, we may use third-party vendors to administer our IT systems, provide cloud hosting services, process payments or insurance-related information, design and operate the website, conduct surveys, or help us with our promotional efforts. These third-party vendors may need information about you to perform their functions.
- **Marketing and advertising vendors** – We may share your information with marketing and advertising vendors that may assist with lead generation, hosting information relating to donors, and potential donors, marketing automation, advertisement placement, and marketing campaigns and communications.
- **Analytics vendors** – We may share your information with analytics vendors in order to understand our site traffic and usage patterns, optimize our site, and identify leads.

- **Advisors** – We may share your information with our lawyers, accountants and other similar advisors.
- **Buyers or successors** – If we engage in a merger, acquisition, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, we may share your information with a buyer or other successor where the information is among the assets being transferred.
- **To comply with laws and protect our rights and the rights of others** – We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft, to protect the security of this site, to enforce or apply our online Terms of Use or other agreements, or to protect our own rights or property or the rights, property, or safety of our users or others.
- **As described in a privacy notice or click-through agreement** – We reserve the right to disclose your information as described in any Privacy Notice posted on a page of this site where you provide that information. By providing your information on that page, you will be consenting to the disclosure of your information as described in that Privacy Notice. We also reserve the right to disclose your information as described in any click-through agreement to which you have agreed.

Your Choices About Personal Information. We respect your right to make choices about the ways we collect, use, and disclose your information. We try to offer you meaningful choices regarding your personal information. Some choices you have regarding personal information include the following.

- **Marketing emails** – As required by applicable laws, to the extent we ever send you promotional emails, you can opt out of receiving such emails from us by clicking the “opt-out” link in any such promotional emails and following the instructions provided.
- **Cookies** – Depending on your browser or device, you may have the option to set the browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies. Each browser and device are different, so we recommend you evaluate the tools and settings available in your browser or device, as well as any available instructions for the same. Please note that if you disable or delete cookies, you may not be able to access or use certain features of the Site.
- **Google Analytics** – As discussed above, we use Google Analytics in connection with the site. If you would like to refrain from having your data collected by Google Analytics, Google has developed an opt-out browser that you can use. You can find more information on how Google uses the information it collects here.
- **Interest-based advertising** – To opt out of personalized or interest-based advertisements, you may be able to adjust the settings on your device. Please go to your device settings and opt out through the controls provided through Google/Android or iOS, as applicable. Each operating system, iOS for Apple phones, Android for Android devices and Windows for Microsoft devices, has its own instructions on how to prevent the delivery of interest-based advertisements. (We cannot guarantee that these instructions will not change or that they will continue to be available; they are controlled by each mobile platform, not us.). For any other devices and/or operating systems, please visit the privacy settings for the applicable device or contact the applicable platform operator. You can also visit <https://optout.aboutads.info> to opt out of interest-based advertisements.
- **Declining to provide information** – You can choose not to provide us with information we may request through our site, but that may result in you being unable to use certain features of our site, request information about our services, or initiate other transactions with us
- **Do not track mechanisms** – Please note that our site does not honor “Do Not Track” signals, and such signals will not impact the operation of this site.

In addition to the above, you may contact us using the details provided at the end of this Policy with any questions about the choices relating to your personal information.

Links to Third-Party Websites. Our site may contain links to third-party websites. Such websites have separate privacy policies that you should review. We do not control these third-party websites and are not responsible for the content of linked websites or those companies' data-handling practices. Links to these websites are provided for convenience or reference only and are not intended as (a) an endorsement by us of the organization or individual operating the website or (b) a warranty of any type regarding the website or the information on the website.

International Transfers. Welia Health is headquartered in the United States, and, as a result, the information you provide to us may reside on servers or workstations located in the United States. You understand and consent that information you provide may be transferred to the United States. You also understand that the data protection laws in the United States may be different from those of the country where you reside.

Retention of Data. We will retain your information for as long as needed to provide you services, products, and information you request or as permitted or required by applicable law.

Security. We use reasonable security measures to protect the confidentiality of information under our control and appropriately limit access to it. However, Welia Health cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Electronic transmissions via the internet are not necessarily secure from interception, and we cannot absolutely guarantee the security or confidentiality of those transmissions.

A Note About Children's Privacy. You must be at least 13 years old to have our permission to use this site. We do not knowingly collect personal information from users under 13 years of age. Should we discover that a child under the appropriate age provided his or her personal information, we will use that information only to respond to that child and inform him or her that we must have parental consent before receiving such information.

Servers and Data Storage. Welia Health is a Minnesota healthcare provider. The servers that support this site are located in the United States. While your information is in our possession, it will generally be stored in Welia Health databases or databases maintained by our third-party service providers on servers and data storage devices located in the United States. United States data protection laws may not provide as much protection as the data protection laws in force in some other countries. However, we will process your information in accordance with this policy no matter where our data is stored. If you are located in a country outside the United States, by using this site, you consent to the transfer of your information to the United States.

Changes to this Policy. We may change our web privacy practices at any time. We will post revised versions on this site. Changes apply to the information collected from the date we post the revision, as well as to information we already hold. We encourage you to frequently read this page so you are aware of any changes that may have been made since your last visit to the website.

Questions and Contact Information. If you have questions or concerns about this Policy, any Privacy Notice, or Welia Health's data practices, please contact us by emailing PrivacyOffice@WeliaHealth.org. You may also contact us in writing at:

Welia Health
Attention Privacy Officer
301 Highway 65 S
Mora MN 55051