# Salem Health Privacy Policy

March 2025

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# **About Salem Health Hospitals and Clinics (SH)**

SH is a community-based, not-for-profit institution that seeks to improve the health and well-being of the people and communities we serve.

# **Scope of this Policy**

This privacy policy applies to:

- Salem Health and our affiliates ("Salem Health," "we," "us," "our").
- Salem Health's online properties (including our websites and websites or mobile applications that link to it), our products and services, [and *list other products, services, websites, communications, or other items that are within scope of this policy*] (the "Services").

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

This Policy does not apply to protected health information that we collect from you pursuant to the Health Insurance Portability and Accountability Act (HIPAA). Additional information regarding our privacy practices with respect to protected health information can be found in the <u>Joint Notice of Privacy Practices</u> page.

We may change this Policy from time to time. If we do, we will notify you by posting the updated version online.

#### **Information We Collect**

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

#### Information you give us

You may provide the following information to us directly:

- Contact and professional information, including name, email address, telephone number, and job title, as well as company name and size.
- Demographic information.
- Audiovisual information, including recordings of online events.
- Payment information, including credit card information.
- Content you may include in survey responses.
- Information contained in your communications to us, including call recordings of customer service calls.
- Information you make available to us via a social media platform.

- Any information or data you provide by interacting or commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.
- Information you submit to inquire about or apply for a job with us.
- Any other information you submit to us.

#### Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services. We also create records when you make purchases or otherwise interact with the Services.

- Device information, including IP address, device identifiers, and details about your web browser.
- *Analytical information*, including details about your interaction with our website, app, and electronic newsletters.
- Diagnostic information, including web traffic logs.
- Business record information, including records of your purchases of products and services.

#### Information We Collect From Other Sources

We may collect the following information about you from third-party sources.

- Contact information, demographic information, and information about your interests and purchases, from consumer data providers.
- Information about your interaction with advertisements that we place on third party websites or from online advertising companies.

## **How We Use Your Information**

We may use any of the information we collect for the following purposes.

- **Service functionality**: To provide you with our products and services, including to provide information to you about our doctors, locations, services and resources, to allow you a convenient means to schedule appointments, message clinicians, and access your records, and for us to conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement**: To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **Personalization**: To offer you recommendations and tailor the Services to your preferences.
- **Security**: To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance**: To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

## **How We Share Your Information**

We may share any of the information we collect with the following recipients.

- Affiliates: We share information with other members of our group of companies.
- **Service providers**: We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract

to use information that we share only for the purpose of providing these business functions, which include:

- Supporting Service functionality, such as vendors that support event registration, customer service and customer relationship management, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email, fax).
- Auditing and accounting firms, such as firms that assist us in the creation of our financial records.
- *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
- *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
- *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
- *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
- *Marketing vendors*, such as entities that support distribution of marketing emails.
- **Business partners**: From time to time, we may share your contact information with other organizations for marketing purposes.
- **Social media platforms**: If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook "like" button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Government entities/Law enforcement**: We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.
- Other businesses in the context of a commercial transaction: We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

## Security

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

# Your Options and Rights Regarding Your Information

Your Account: Please visit your account page to update your account information.

**Email Unsubscribe**: If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

Cookie Choices: You have options to limit the information that we and our partners collect.

- You may disable cookies in your browser or mobile device using their settings menus. Because we use cookies to support Service functionality, disabling cookies may disable some elements of our online properties.
- You may use our cookie settings menu.
- You may contact us directly.

If you delete your cookies, you may also delete your opt-out preferences.

**Do Not Track**: Your browser or device may include "Do Not Track" functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy regardless of whether a Do Not Track signal is received.

**Jurisdiction-specific rights**: You may have certain rights with respect to your personal information depending on your location or residency. Please see "privacy disclosures for specific jurisdictions" below. Please contact us to exercise your rights.

## **Other Important Information**

### Information about children

The Services are intended for users age sixteen and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of sixteen, we will delete that information. Please contact us with any concerns.

## Sharing of Medical or Health Information

To the extent that we receive protected health information about you, that information is subject to electronic disclosure to the extent permitted by applicable law. Additional information regarding our privacy practices with respect to protected health information can be found in the <u>Joint Notice of Privacy Practices</u> page.

# **Privacy Disclosures for Oregon**

The Oregon Consumer Privacy Act ("OCPA") provides Oregon residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct, delete, and limit disclosure of personal information. Residents of Oregon have the following rights:

- Opt out of "sales" of personal information and use of their personal information for "targeted advertising," as those terms are defined under applicable law.
- *Opt out of "profiling"* under certain circumstances, as defined under applicable law.
- Confirm processing of and access to personal information under certain circumstances.
- Correct personal information under certain circumstances.
- Delete personal information under certain circumstances.

Residents of Oregon can exercise their rights by contacting us using one of the methods listed below. Residents of Oregon have the right to appeal a denial of their request by contacting us as described in the notice of denial.

# Contact information, submitting requests, and our response procedures

#### Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email: Privacyofficer@SalemHealth.org

Telephone: 503-814-2628

Mail: Salem Health, Attn: Privacy Officer, 890 Oak Street SE, Salem, Oregon 97301

#### Making a request to exercise your rights

**Submitting requests**: You may request to exercise your rights by submitting the form on this page or making a request using the contact information above.

You may, under certain circumstances, authorize another individual or a business, called an authorized agent, to make requests on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Verification**: We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.