Notice of Privacy Practices

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Effective Date

This Notice of Privacy Practices ("Notice") took effect on **October 25, 2022 and was last reviewed on October 10th, 2025**. It will remain in effect until Tabia replaces it. Tabia must abide by the terms of this Notice while it is in effect.

Tabia's Commitment to Your Privacy

Tabia Health (herein, "Tabia", "we", "us" "our") is the provider of systematic care management software. Tabia provides a systematized means to coordinate patient care delivery and management ("Services"). In addition, we are an organized health care system that jointly participates in numerous activities including quality assessment and improvement activities. Tabia respects and is committed to protecting the privacy of your medical information. In performing its services, Tabia will receive, create, and disclose your protected health information ('PHI'). Tabia is required by law to maintain the privacy and security of your PHI and to provide you with notice of our legal duties and privacy practices with respect to your PHI. For information about our collection, use, and disclosure of personal information other than PHI, please see our privacy policy at www.Tabia.health/privacy-policy/ and the privacy policies posted on the websites of the affiliates listed above.

Your Information. Your Rights. Our Responsibilities.

In this Notice, we describe:

- Information We Collect About You
- When We Use and Share Your Information
- When We Must Share Your Information
- When We Need Your Authorization to Use or Share Your Information
- Your Rights Regarding Your Information
- How We Keep Your Information Safe
- Changes to the Terms of This Notice

Information We Collect About You

To provide you with the Tabia Services, we collect PHI about you from a few sources including directly from you. PHI is information about you that may be used to identify you (such as your name), and that relates to:

- Your past, present or future physical or mental health or condition,
- The provision of healthcare to you, or
- Your past, present, or future payment for the provision of healthcare.

PHI Collected From You	PHI Collected from Third Parties	PHI Collected Automatically
Of course, as you use the Tabia Services you will need to provide Tabia with information about yourself and your medical history, past treatment, and potential future treatment options. As you communicate with us, your telephone calls, emails, and other communications between you and Tabia and/or Tabia's service providers, may be recorded and logged. As such, we will collect and maintain all information discussed during such communications including your identity, the date and time of the communication, and the contents of the communications.	In connection with the Tabia Services, we may collect information about you from third parties such as: • Past or current health care providers • Health insurance and pharmacy benefit management companies • Your employer or other organization that has contracted with Tabia to give you access to the Services may provide us with your name and demographic information, so we know you are eligible for the Services	When you register and log in to our secure websites and mobile apps, Tabia automatically collects information about you. Tabia must be able to link your activity back to your identity so that changes in our systems can be made and we can track the Services you used. As such, we automatically collect the following types of information about you when you use our secure websites: • IP address • Device information

PHI Collected From You	PHI Collected from Third Parties	PHI Collected Automatically
		• General geographic information • Dates and times you accessed and used the secure websites/mobile apps, features you used, and how long you use the secure websites/mobile apps

When We Use and Share Your Information

To provide you with the Services, we will need to use and disclose your PHI for the following reasons:

Treatment Activities	Payment Activities	Healthcare Operations Purposes
Your providers may use your PHI within Tabia to treat you and provide you with medical services. We may also disclose your PHI to other physicians or healthcare providers so that they can treat you and provide you with medical services. When you use our Services, to enhance the continuity and quality of care we provide to you, your PHI may be available to providers for them to provide you with treatment and medical services. For example, your past consults will be available to the provider when you seek a new consult.	We can use and share your PHI to get paid and for other payment activities. For example, we will send a claim to your health insurer to get paid. We may share PHI with other entities covered by HIPAA, such as health plans, for their payment activities.	Tabia may use and disclose your PHI to run our business. For example, to improve medical services, provide customer service, conduct quality review, contact you about the Services available to you and health benefits, monitor the qualifications of providers, and other healthcare operations activities. We may share PHI with

Treatment Activities	Payment Activities	Healthcare Operations Purposes
		other entities covered by HIPAA, such as health plans, for their business operations only if they also have or had a relationship with you.

We may also use PHI to:

- Participate in health information exchanges (HIEs) so that we can share, request, and receive electronic health information from other health care organizations for treatment, payment, and healthcare operations purposes as described above.
- Engage third parties to assist Tabia with our payment and healthcare operations. If any such third party needs access to PHI to perform its services on behalf of Tabia, Tabia will require that third party to enter a written agreement that protects the PHI. We provide only the minimal PHI to accomplish the intended purpose of the use and sharing of the PHI.
- With your permission and express authorization, communicate with family and friends who are involved in your care and payment for care.
- Create deidentified and aggregate information.
- Track your compliance with any treatment program assigned by your care provider
- Improve performance of the Services and our systems and technologies

When We Must Share Your Information

There are limited times when Tabia may be permitted or required by law to use or disclose your PHI without your authorization. These include the following:

- For public health activities such as reporting certain diseases
- To protect victims of abuse or neglect, such as child abuse and elder neglect
- For judicial and administrative proceedings such as responding to subpoenas
- For workers compensation claims
- To prevent or lessen a serious and imminent threat of harm to a person or the public
- When required by law or for law enforcement purposes
- For state and federal health oversight activities such as physician licensing and disciplinary action
- To coroners, medical examiners, and funeral directors in limited circumstances

- For organ donation and transplantation
- For research approved by an institutional review board
- For specialized government functions such as national security

When We Need Your Authorization to Use or Share Your Information

When We Need Your Authorization to Use or Share Your Information. For instance, your written authorization is needed prior to us using and disclosing your PHI :

- For Marketing purposes
- For a sale of your PHI
- For fundraising purposes
- To your employer
- When relatives or other persons you desire to have access to your PHI need access to your PHI

If Tabia wants to use or disclose your PHI for the purposes listed above or for any other purpose not described in this Notice, we will seek your authorization using the HIPAA Authorization to Disclose Protected Health Information Form here. You have the right to revoke any authorization that you previously provided.

Your Rights Regarding Your PHI

You have the following rights regarding your PHI maintained by Tabia. Additionally, your medical power of attorney or legal guardian can exercise these rights on your behalf and make choices about your health information.

Right to Access PHI

Most of your PHI that Tabia maintains is available to you directly on the Member Portal. Simply log in to obtain your medical and consult history. To request access to information that is not available to you online, you must submit your request in writing to Tabia on our standard Request to Access PHI Form. To obtain a copy of the secure form, please email us at legal@tabiahealth.com. Tabia may impose a fee for the costs related to copying and mailing. Tabia may deny your request to access your PHI in certain limited circumstances. If that occurs, we will inform you of the reason for the denial.

Right to Request Amendment of PHI

You have a right to request that Tabia amend your PHI if you believe it is incorrect. Some changes to your PHI you can make yourself on the Member Portal. To request an amendment of your PHI that you cannot make yourself online, you must submit your request in writing to Tabia on our standard PHI Amendment Form. To obtain a copy of the secure form, please email us at legal@tabiahealth.com. If Tabia denies your request, you will be permitted to submit a statement of disagreement for inclusion in your records.

Right to Request Restrictions on Uses and Disclosures of PHI

You have the right to request that Tabia not use or disclosure your PHI for treatment, payment, or healthcare operations purposes. To request a restriction, you must submit your request in writing to Tabia on our standard Request for Restrictions Form. To obtain a copy of the secure form, please email us at legal@tabiahealth.com. Tabia is not required to agree to your request unless you are requesting that we not disclose your PHI to your insurance company or health plan. In such cases, you will be required to pay for services out of pocket.

In writing Privacy Officer Tabia Health legal@tabiahealth.com

How We Keep Your PHI Safe

The security of your PHI is very important to us and all the PHI you provide to Tabia is protected by strict security safeguards. We use administrative, technical, and physical safeguards to keep your PHI from unauthorized access, and other threats and hazards to its security and integrity. We base our security program on complying with state and federal law, including the HIPAA Security Regulations, as well as industry best practices. We regularly validate the controls we have in place through annual assessment and audits. More specifically, we protect the confidentiality of your PHI in many ways including the following:

- Sensitive data is encrypted at our databases.
- Access to our databases is tightly controlled and is only allowed to a small subset of technical administrators.
- Best in class cloud providers, with high security standars, are used to host the application and data.
- Access reviews are performed periodically to certify staff roles are still appropriately assigned.
- Our employees are trained on an annual basis on how to maintain the privacy and security of our members' information.

If your unsecured PHI is disclosed to an unauthorized person, despite our security safeguards, we will notify you promptly if such disclosure may have compromised the privacy or security of the PHI.

Changes To this Notice

Tabia reserves the right to change the terms of this Notice at any time, as long as the changes are in compliance with applicable laws. If Tabia changes the terms of this Notice, the new terms will apply to all PHI that it maintains. If Tabia changes this Notice, it will post the new Notice on its Web site and will make the new Notice available upon request.