



Avicenna Health Solutions

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PRIVACY POLICY

1. DEFINITIONS

“Consumers” are those individuals who elect to communicate with Health Professionals on *EOccMed.com*.

“Health Professionals” are licensed physicians, psychologists, mental health counselors, diabetes educators, nurse practitioners, chiropractors, naturopaths, and nutritionists, who communicate with Consumers using *EOccMed.com* and who arrange to be listed here.

“Patients” are those Consumers who have agreed to accept a Health Professional’s services in making diagnoses or in recommending treatment or both for them, including, where the Health Professional deems it appropriate and lawful, and where it is within the scope of the Health Professional’s practice, the prescribing of medications exclusive of controlled substances.

EOccMed.com Services means video, audio, or written communication with a Health Professional, or some combination of such communications.

“We” or “Our” or “Us” means *EOccMed.com* or Video Medicine, Inc.

“You” or “Your” or “Yourself” or “My” refers to a Consumer or a Patient.

2. PRIVACY POLICY

As a general rule, *EOccMed.com* does not collect information pertinent to the services Health Professionals provide, either educational information to Consumers or clinical services to Patients. Other than information needed for administration of Our service, *EOccMed.com* does not seek to collect individually identifiable health information as defined at 45 CFR §160.103.

At Your request, however, and only at Your request, *EOccMed.com* will store protected health information (“PHI”) as defined at 45 C.F.R. § 160.103, for Your use and, at Your election, your Health Professionals’ use. You have the option to upload or not to upload PHI, but if You do, You will have access to Your own PHI. We also offer an optional anonymous mode to further protect Patient identity. No PHI is required to use *EOccMed.com*.

PHI provided to *EOccMed.com* and transmitted between or among mobile devices, the *EOccMed.com* website, and its servers is encrypted. The passwords that allow access to the *EOccMed.com* App and website, which may contain PHI, are also encrypted. The *EOccMed.com* server that PHI may be stored on is protected by a firewall. Human access is limited to that access needed to maintain the server, and excludes access to PHI. *EOccMed.com* servers require secure shell certificates for access. The servers have all ports closed (deny-all mode) except for a few that remain open because they are vital for *EOccMed.com* to operate. These are secured with authentication (login/password) and encryption (Hypertext Transfer Protocol Secure/ Secure Socket Layer (“HTTPS/SSL”) traffic. *EOccMed.com* undertakes reasonable efforts to secure all PHI it is sent. In the event of a hacker attack, however, it is always possible, despite deployment of reasonable safeguards, that PHI may be exposed. By using *EOccMed.com*, You accept this risk of unauthorized PHI use or disclosure.

You should be aware that We may monitor activity on *EOccMed.com*, tracking such matters as the number of users, services accessed, and technical data to improve the quality of Your experience, and to foster compliance with these Terms. By using *EOccMed.com*, You hereby specifically agree to such monitoring.

EOccMed.com may automatically collect information about the mobile or other device You use to access *EOccMed.com*, including for example the make and model of Your device, and (if applicable) the type of browser software You use, the operating system You are running, and Your Internet Protocol address. In addition, Your location may be collected and stored via the functionality of Your mobile or other device and, if so, *EOccMed.com* may store and have access to such information. In addition, We reserve the right to use the information we collect about Your mobile or other device (including its location), which may at times be able to identify You, for any lawful business purpose, including without limitation to help identify problems with Our servers, to gather de-identified demographic information, and to otherwise administer *EOccMed.com*.

We allow access to Our database by third parties that provide Us with services, such as technical maintenance, but only to and only to the extent necessary to provide those services. While we will seek to require such third parties to follow appropriate privacy policies and will not authorize them to use this information except for the express purpose for which it is provided, *EOccMed.com* bears no responsibility for any actions or policies of third parties. We may also provide access to Our database in order to comply with legal obligations arising from official investigations or legal proceedings, including, for example, in response to subpoenas, search warrants, court orders, or other legal process.

EOccMed.com is not a “covered entity” as defined in the Health Insurance Portability and Accountability Act and the regulations promulgated under that Act (“HIPAA”), specifically including without limitation 45 CFR §160.103. The Health Professionals with whom You may communicate through *EOccMed.com* are subject to laws governing the privacy of medical records. Any individually identifiable health information provided to *EOccMed.com* by a Health Professional is subject to or

protected by law. To the extent the law applies to *EOccMed.com*, We will make reasonable efforts to maintain the privacy of Your health information.

We also make reasonable efforts to monitor *EOccMed.com* servers for any infiltration or attacks. Some attacks are easier to identify than others. Distributed denial-of-service (“DDos”) attacks, or Brute-force attacks, for example, are much easier to identify than attacks in which someone mimics a user and steals a username and password. Consumers or Patients electing to store PHI on *EOccMed.com* accept responsibility for securing their usernames and passwords. Should We become aware of a compromise of PHI, We shall notify the relevant Health Professionals as soon as possible but in any event within thirty (30) days of learning of that compromise.