

JWM Neurology Privacy Policy

Last modified: April 13, 2017

- I. JWM Neurology, LLC ("JWM Neurology") is committed to protecting your privacy by complying with this policy ("Privacy Policy").

Before you use the Website, please read the Privacy Policy carefully. By your access or use of the Website, you are indicating that you agree to the Privacy Policy. If you do not agree with the Privacy Policy, do not access or use the Website. In addition, you may be required to acknowledge your consent to the Privacy Policy or third party terms of use to navigate to certain pages of our Website or to complete some transactions.

- II. What this Privacy Policy Applies To**

The terms of the JWM Neurology Terms of Use and the Notice of Privacy Practices apply to your use of the Website and are hereby incorporated. The Terms of Use govern your use and access to the Website. Additionally, each affiliate of JWM Neurology that provides healthcare services maintains a Notice of Privacy Practices ("NPP"). The affiliate's NPP provides information about how the applicable JWM Neurology affiliate might use and disclose your protected health information ("PHI").

- III. What this Privacy Policy Tells You**

The Privacy Policy tells you how JWM Neurology collects, uses, protects, shares, and controls information about you related to your interactions with the Website.

- IV. What Information is Collected**

The Privacy Policy applies to information we collect on the JWM Neurology Website, which consists of all websites located on this root domain: JWMneuro.com (the "Website"), in communications between you and the Website, such as email, text, or other types of electronic messages.

The Privacy Policy does not apply to information gathered offline by JWM Neurology or information collected by any third party website that we may link to or may be accessible from the Website.

- V. When Information is Collected**

Information is collected when you visit the website, subscribe to a newsletter, fill out an online form, or otherwise enter information in the Website.

- VI. How We Use Information**

We may use your information to:

- To personalize your experience and to allow us to deliver the type of content most interesting to you
- To improve our Website in order to better serve you.
- To allow us to better serve you in responding to your requests.

VII. We Take Measures to Keep the Website Safe

The website platform has a multitude of security mechanisms in place, such as AAA (Authentication, Authorization, and Access Control), attack detection and annihilation mechanisms, encryption of sensitive data, firewalls, anti-virus, etc.

The website platform is a PCI Level 1 compliant product. Accordingly, all cardholder data specific mechanisms, environments, policies, procedures, etc. have been audited for security compliance by an accredited 3rd party investigator.

The platform code and environments are regularly tested for security holes both manually and using various 3rd party penetration software. A multitude of security standards (e.g., OWASP) are considered and followed.

VIII. Changes to the Privacy Policy

From time to time, JWM Neurology may change the Privacy Policy at its sole discretion. If you do not agree with the revised Privacy Policy, do not continue to use the Website. Accessing or using the Website means that you have accepted any changes to the Privacy Policy.

IX. Third-Party Websites May Have Different Privacy Policies

The Website may produce automated search results or otherwise link you to other websites on the Internet. It is important to understand that when you access or use these other websites, the terms governing your use of other websites may be different from JWM Neurology's Terms of Use, Privacy Policy, and Notice of Privacy Practices. If you visit another website, you are encouraged to examine the privacy policies and/or terms of use policies of that website.

Some portions of our Website are provided in cooperation with third parties or ("Third Party Pages") or are provided by third parties ("Third Party Websites") and as a result have terms of use that are different from the JWM Neurology Terms of Use, Privacy Policy, and NPP, as applicable. A list of Third Party Pages and Third Party Websites that you may encounter as you navigate across the Website include, but is not limited to the following:

1. When you access the JWM Patient Portal (<https://myhealthrecord.com>) you will be required to accept the Terms of Use and Privacy Policy before setting up your Patient Portal account.
2. When you access InstaMed, the following terms apply to you: [Terms of Use](#) [Privacy Policy](#)

X. Third Party Disclosure

JWM Neurology does not sell, trade, or otherwise transfer to outside parties your personally identifiable information. We do provide your personally identifiable

information to our Website hosting partners and other parties who assist us in operating our Website, conducting our business, or servicing you, so long as those parties agree to make reasonable efforts to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our Website policies, or protect ours or others' rights, property, or safety.

Non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

XI. Children Online Privacy Protection Act ("COPPA")

The Website is not intended to be used by and is not directed at children under 13 years of age. We comply with the Children's Online Privacy Protection Act ("COPPA") and do not knowingly permit registration or submission of personally identifiable information by anyone under 13 years of age. This age requirement is posted each time We request personally identifiable information. If you believe information of a child under 13 has been submitted, please advise us in writing and we will delete it.

XII. Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current Website activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about Website traffic and Website interaction so that we can offer better Website experiences and tools in the future.

We use cookies to:

- a. Understand and save user's preferences for future visits.
- b. Keep track of advertisements.
- c. Compile aggregate data about Website traffic and Website interactions in order to offer better Website experiences and tools in the future. We may also use trusted third party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies.

If you turn cookies off, some features will be disabled. It will affect some features that make the Website experience more efficient and some of our services will not function properly.

We do not track your behavior at other websites and to use to advertise to you.

XIII. Do-Not-Track Signals

JWM Neurology honors do-not-track signals and does not track, plant cookies, or use advertising when a do not track browser mechanism is in place. We cannot control how third-party websites handle do-not-track options. Please read the privacy policies of any third party websites to understand their response to do-not-track mechanisms.

XIV. CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- a. Send information, respond to inquiries, and/or other requests or questions.
- b. Communicate with you via the secure Patient Portal related to inquiries, test results, appointments, and other communications specified in the Patient Portal Terms of Use.
- c. We may also send you additional information related to your product and/or service.
- d. Market to our mailing list or continue to send emails to our clients after the original transaction has occurred

To be accordance with CANSPAM we agree to the following:

- a. NOT use false, or misleading subjects or email addresses
- b. Identify the message as an advertisement in some reasonable way
- c. Include the physical address of our business or site headquarters
- d. Monitor third party email marketing services for compliance, if one is used.
- e. Honor opt-out/unsubscribe requests quickly
- f. Allow users to unsubscribe by using the link at the bottom of each email

If at any time you would like to unsubscribe from receiving future emails, you can follow the instructions at the bottom of each email.

XV. Contacting Us

If there are any questions regarding the Privacy Policy you may contact us using the information below:

Chief Operating Officer at 317-308-2800 or medicalaffairs@jwmneuro.com