



NOTICE OF PRIVACY PRACTICES

Effective Date: June 1, 2021

THIS NOTICE OF PRIVACY PRACTICES DESCRIBES HOW CONNECTING POINT COLLECTS, USES AND SHARES PERSONAL DATA. PLEASE REVIEW THIS NOTICE CAREFULLY.

What We Do:

Connecting Point is a public agency dedicated to providing programs and services that promote the health and independence of the people in our community. We serve as a 2-1-1 information resource and online data hub that provides referrals, care coordination, outreach, education, and other services to help individuals in our community obtain benefits or connect with other companies or agencies (“Referral Partners”) within our network, that provide health and human services, health insurance, housing, food, transportation, employment and job training, elder care, benefits for the disabled, disaster relief and other services.

Privacy of Information:

The contracts we enter into with our Referral Partners and technology vendors require that systems and processes be implemented to protect the privacy and security of Personal Data to ensure that access to Personal Data is limited to authorized personnel for a permitted purpose. This Notice of Privacy Practices is meant to inform you of the ways in which we collect information about you, “Personal Data,” and how we use and share your Personal Data. It also describes your rights to access and control your Personal Data and obtain a copy of the Personal Data we have collected from You.

Changes to this Notice of Privacy Practices:

We reserve the right to change this Notice and our Privacy Practices at any time. We reserve the right to make the revised or changed Notice effective for the Personal Data we have already collected, as well as any new or additional information we

receive following the effective date of the Notice. You will not automatically receive a revised Notice of Privacy Practices.

How to Obtain a Hard Copy of this Notice:

We will post a copy of the current Notice on our web site at www.connectingpoint.org. A copy of the Notice currently in effect will also be available at the registration area of our facility located at 208 Sutton Way, Grass Valley, CA 95945. You have a right to receive a paper copy of this Notice and a copy will be mailed to you upon written request.

Where Personal Data Comes From:

Personal Data we collect about you may come from a variety of sources including information you provide to us directly through our website or when you speak to one of our representatives by calling our hotline. Personal Data may also be shared with us by a Referral Partner that has provided services to you in the past, or that is providing services to you currently. Information may also come from a family or household members, caretakers or personal representatives.

Referral Partners in our network may include doctors, nurses and other healthcare professionals, public health agencies, insurers, social workers, housing officials, emergency medical services providers, and other professionals that provide or coordinate healthcare, mental health or behavioral health treatment, housing and emergency shelter, and programs that provide transportation, education, food and financial assistance, job placement and job training among other services. For Information our Referral Partners, Please Visit: 211connectingpoint.org/referral-partners

Permission to Use and Share Personal Data:

When you or a family or household member, caretaker or personal representative provides us with Personal Data, you give us permission to share your information with our staff members and contractors in order to provide you, your family or household members with referrals and other services and to use your Personal Data in connection with our business operations, to protect the security of our systems and customers, to meet our contractual and legal obligations, for research, or any other lawful use or legal requirement as outlined below. You also

agree that we can share your Personal Data with Referral Partners in our network in order to provide services to you (and your family and household members) or to refer you (and your family or household members) to other providers and programs in the region. If you disclose any Personal Data about your family, household members, your representatives, caretakers or other people (“other people”) to us or to our Referral Partners, you represent that you have the authority to do so and that we may use the information to contact the family, household, caretakers or representative you have identified and use the information in accordance with this Privacy Policy.

You have choices when it comes to the data you share. When you are asked to provide Personal Data, you may decline to provide some or all of the information requested and you can “Opt Out” of sharing information with our Referral Partners. If you Opt Out of sharing information, we may be unable to provide some services to you, including referrals and/or application assistance. Even if you Opt Out of sharing information, we may still use Personal Data in connection with our internal business operations, to provide services directly to you or to comply with applicable laws.

How We Use and Share Personal Data:

We may use and share your Personal Data in accordance with this Notice of Privacy Practices, as permitted or required by applicable state and federal laws or as expressly permitted by you. The following list generally describes how we may use and share Personal Data:

- **To Contact You, a Family or Household Member, Caretaker or Personal Representative:**

When you call our hotline 2-1-1 or 1-833-DIAL211, you will be asked to provide us with contact information for yourself and other persons in your household or involved in your care. If you do so, you give us permission to use that information to contact you and the individuals you have identified by telephone, email or text. We may use the information to communicate necessary information about your appointments, to update you on your care or care management options, programs and benefits you or your family or household members may be eligible for, or to connect you with any of our

Referral Partners and to follow up with you, your care providers or our referral partners about services you have received or programs you have been enrolled in and for feedback.

You may request that we communicate with you in a certain manner or at an alternative location. For example, you may ask that we contact you only at home. Your request must be in writing and specify the alternative means or location for communicating with you. We will accommodate a request for confidential communications that is reasonable based on our system capabilities.

Communicating with Minors: Connecting Point may require parental consent to collect information or communicate directly with a minor under the age of thirteen (13) years, except that Connecting Point may collect basic information from a minor such as minor's name, age and parent contact information. We may also store information about referrals made for the minor.

- **To Verify Your Identity:**

We may use information or require you to provide us with information or proof to verify your identity or the identity of family or household members, caretakers or personal representatives before we share Personal Data or respond to a request for a copy of Personal Data we have collected about you.

- **Referral for Treatment, Care Coordination, Case Management, Health Insurance, application for and the Determination of Eligibility for Benefits and Programs:**

We may disclose Personal Data to Referral Partners to facilitate a referral or the delivery of healthcare, qualify you for health insurance or insurance benefits, care coordination, case management, to qualify and enroll you in county health and human services agencies programs and benefits, to receive benefits under Medicare, Medicaid, or the Social Security Administration, or other public agencies providing government funded health and human services programs benefits.

- **Qualification for Other Programs and Benefits:**

We may use and disclose your Personal Data help you cover or reduce your utility bills, reduce debt or tax liability or for other programs and benefits.

- **For Business Operations, Audit and Evaluation Studies:**

We may use and disclose your Personal Data for our internal business operations, in connection with an audit or evaluation study. For example, we may use Personal Data to review the quality of our referral services, and to evaluate the performance of our staff. We may use Personal Data for our business planning and program development, and to investigate complaints. We may also de-identify or anonymize Personal Data so that it can be used to conduct evaluation studies, perform research or evaluate community needs and gaps in services.

- **Business Associates:**

We may use or disclose protected health information to our subcontractors, and “business associates” when they perform services for us or when we provide services to a health care provider or insurance company as a HIPAA business associate that requires the use of protected health information.

- **Public Health and Health Oversight Activities:**

We may use or disclose Personal Data for public health activities that are permitted or required by law. For example, we may disclose Personal Data, including protected health information to a public health agency to control or prevent the spread of a communicable disease, prevent injury or disability, for public health oversight activities or interventions. Oversight activities may include audits; investigations; inspections; licensure or disciplinary actions; or civil, administrative, or criminal proceedings or actions. Oversight agencies include government agencies that oversee the health care system, government benefit programs, other government regulatory programs, and government agencies that ensure compliance with civil rights laws.

- **When Required by Law:**

We may disclose your Personal Data when required by law; such as in the course of a judicial or administrative proceeding or in response to an order of a court or administrative tribunal, a subpoena, a discovery request, or other lawful process, to law enforcement officials for law enforcement purposes, such as to; respond to a court order; locate or identify a material witness, or missing person; report suspicious injuries; or report a crime or identify a victim, or to a government authority that is authorized by law to receive reports of abuse, neglect, or domestic violence.

- **Research:**

We may use and share Personal Data for certain kinds of health or human services research. Some research projects may require a special approval process and your written authorization. In some instances, the law allows us to conduct research using de-identified Data without permission. We may use de-identified information in connection with publication of success stories, for marketing, for evaluation studies, research and a variety of other purposes.

- **Shared Medical Record/Health Information or Social Information Exchanges:**

Some of our Referral Partners maintain protected information about their clients in a common electronic record that allows business associates or other Referral Partners to share protected health information and/or Personal Data. We may participate in various electronic health or social information exchanges that facilitate the sharing of protected health information or Personal Data among healthcare, health and human service agencies or other Referral Partners.

Other Uses and Disclosures of Personal Data That Require Special Permission

- **Disclosures Requiring Your Written Authorization:**

Most uses and disclosures of psychotherapy notes, substance use disorders, and uses and disclosures of protected health information, and the sale of protected information may require your written authorization. A written

authorization may be created in paper or electronic format using email, audio, video or electronic signature. Once received, we may store a copy of your authorization electronically and share it with our Referral Partners.

- **Marketing and Fund Raising:**

We may use Personal Data, programs and services utilized by you, dates of service and service outcomes or your feedback for fundraising, advertising or marketing purposes. We will not use or disclose your Personal Data for marketing purposes without your consent. We may also send information about our programs and fundraising to you. If you do not want to receive fundraising, or marketing material, you may choose to Opt Out of receiving those communications by notifying us in writing.

- **Collection of Personal Data from Minors Under the Age of 13:**

We will not collect Personal Data directly from a minor unless a minor contacts Connecting Point directly to request information or a referral. If a minor contacts Connecting Point, we may collect minimal information in order to satisfy the minor's request such as name, age, contact information and the contact information for the minor's parent or guardian. If we are unable to obtain parental consent we may still provide the minor with the referral requested. If we are able to obtain the parent's consent or authorization, the minor's record will be treated much like any other Client. With parental consent, a minor can assess services and freely communicate and share Personal Data with our Referral Partners. Parents or guardians can change or revoke the minor's consent choices previously made and review, edit or request the deletion of the Personal Data of minors for whom they have provided consent or authorization.

Retention of Personal Data:

We will retain Personal Data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine retention periods include: the length of time we have an ongoing relationship with you; whether there is a legal obligation that requires us to store or delete Personal Data within a certain timeframe, and whether retention

is advisable for purposes of statutes of limitation, litigation, audit or regulatory investigations.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

The Right to Access Your Own Personal Data:

You have the right to inspect and to receive a copy of your Personal Data, including demographic information, services requested, referrals made, and dates of service, for as long as we maintain it. All requests must be made either by email or in writing and delivered to the address indicated below. We may charge you a nominal fee for each page copied and postage if applicable.

Right to Amend:

You may ask us to amend, or correct information you provide to us. If the information was shared with us by your healthcare provider, a government agency, Referral Partner or other third-party provider, you must contact that provider, agency or Referral Partner to correct or amend the information.

Right to Revoke Your Permission to Share:

You may revoke your permission to share your Personal Data or the Personal Data that concerns your minor under the age of 13, at any time in writing by mailing or emailing your request to the address listed below. Your revocation will be effective for future uses and disclosures of your Personal Data. The record of information we maintain about You will become inaccessible to our Referral Partners and they will no longer be able to see your information in our system. However, the revocation will not be effective for information that we have used or already disclosed to a Referral Partner in reliance on your authorization or consent and prior to receipt of your written revocation. After revocation, we will continue to store and use your Personal Data internally for our own business purposes, including auditing, accounting, training and quality improvement and to provide services directly to you.

Right to be Notified of a Breach:

In the event your Personal Data is accessed by an unauthorized third party as a result of a breach or security incident we will notify you in writing or by email or other electronic means as required by applicable law.

Complaints:

Please notify us directly, if you feel your rights have been violated or if you have concerns about how we use or share your Personal Data. We will do our best to address your concerns promptly and to your satisfaction.

Requests:

Please submit all requests, complaints or concerns in writing to our Privacy Officer at:

Connecting Point

Attn: Privacy Questions and Requests:

TECHNOLOGY DISCLOSURE

Where Personal Data is Stored and Processed:

Connecting Point takes steps to ensure that the Personal Data collected under this Privacy Policy is processed in accordance with this Notice of Privacy Practices and the requirements of applicable law wherever the data is located. Occasionally Personal Data may be stored, accessed or processed in a location outside the boundaries of the State of California or the United States by an employee or contractor. Regardless of the location or whether Your Personal Data is stored in paper or electronic form, our employees and contractors are required to protect the privacy and security of Personal Data and may face sanctions or other legal penalties if they fail to comply with this Notice of Privacy Practices and applicable federal and state laws.

Security:

Connecting Point uses organizational, technical and administrative measures to protect Personal Data within our organization. We also require Referral Partners with whom we share sensitive Personal Data, such as health information, to

implement and maintain reasonable security and privacy measures to protect Personal Data.

Cookies:

Cookies are small pieces of information, which are issued by your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device, let you navigate between pages efficiently, remember your preferences, and generally improve the user experience. Some of the cookies issued by the Connecting Point web server last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to our web site(s) and will last longer.

Most web browsers automatically accept cookies. If you prefer, you may change your browser settings to prevent that or to notify you each time a cookie is set. For further information on cookies, including how to see what cookies have been set on your device and how to manage and delete them using different type of browsers, visit www.allaboutcookies.org.

The ability to enable, disable or delete cookies can also be completed at browser level. In order to do this follow the instructions provided by your browser, e.g. Firefox, Google Chrome or Microsoft Edge (usually located within the "Help", "Tools" or "Edit" facility). Disabling a cookie or category of cookies does not delete the cookie from your browser, you will need to do this yourself from within your browser.

Please note however, that by blocking or deleting cookies used on the Connecting Point web site you may not be able to take full advantage of the site.

In some cases, browser-based or flash-based cookie enabled websites may deploy behavior tracking and browsing history-based ad services. These types of cookies may act as a second level of authentication supplementing your user login or serve you ads that match your content browsing history and preferences. In any case, to control these third-party cookies may be controlled by you through your browser privacy setting.