

B. NOTICE OF PRIVACY PRACTICES

1. Thomas Allen provides all persons a Notice of Privacy Practice. This Notice provides information regarding the uses and disclosures of protected health information that may be made by Thomas Allen, person's rights as they pertain to protected health information, and Thomas Allen's legal duties with respect to protected health information and person's rights.
2. Thomas Allen's Notice of Privacy Practice complies with the requirements as noted in the Federal Health Insurance Portability and Accountability Act, Standard for Privacy of Individually Identifiable Health Information. Thomas Allen's notice is titled Notice of Privacy Practices.
3. Provision of Notice of Privacy Practices to Persons
 - a. Thomas Allen provides the Notice of Privacy Practices to the person or the person's legal representative no later than the date of the first delivery of services. A good faith effort is made to obtain a written acknowledgment of receipt of the Notice of Privacy Practice provided to the person or the person's legal representative. This written acknowledgment is documented on the last page of the Notice of Privacy Practices through a signature and date. The original notice is placed in the person's file and a copy provided to the person or his/her legal representative.
 - b. In an emergency treatment situation, Thomas Allen shall provide the Notice of Privacy Practice and obtain written acknowledgement of receipt of the Notice as soon as reasonably practicable after the emergency treatment situation is addressed. The delay in the provision of the Notice is to be documented and the documentation placed in the person's file.
 - c. If Thomas Allen is unable to obtain a written acknowledgment, it shall document its good faith efforts to obtain the acknowledgment and the reason why the acknowledgment was not obtained. This information is documented on the Notice of Privacy Practices and placed in the person's file. This would include situations where the person refuses to sign the notice or return a signed notice.
 - d. The Notice of Privacy Practices and any documentation pertaining to the same is retained in the person's permanent file for the duration of service delivery. (It is not archived to storage.)
4. Posting and Availability of Notice of Privacy Practices
 - a. Thomas Allen has copies of the Notice of Privacy Practice available at its service delivery site(s) and at the Corporate Office for persons and/or his/her legal representatives.
 - b. Thomas Allen posts its Notice of Privacy Practice prominently on each page of the web site and makes the Notice of Privacy Practice available electronically through the web site. The web site address is <https://www.thomasalleninc.com>

- c. Thomas Allen may provide the Notice of Privacy Practice to a person or the person's legal representative by e-mail, if the person or the person's legal representative agrees to receive electronic notice and such agreement has not been withdrawn. If Thomas Allen knows that the e-mail transmission has failed, a paper copy will be provided to the person or the person's legal representative. A person or the person's legal representative who receives an electronic Notice of Privacy Practice retains the right to obtain a paper copy of the Notice of Privacy Practice from Thomas Allen upon request.
5. Revision to the Notice of Privacy Practices
- a. Thomas Allen shall promptly revise and distribute its Notice of Privacy Practice whenever there is a material change to the uses or disclosures, person rights, Thomas Allen legal duties, or other privacy practices stated in the Notice of Privacy Practice.
 - b. Except when required by law, a material change to any term of the Notice of Privacy Practice may not be implemented prior to the effective date of the revised Notice of Privacy Practice in which such material change is reflected.
 - c. Whenever the Notice of Privacy Practice is revised, Thomas Allen:
 - 1) Makes the Notice of Privacy Practice available upon request by the effective date of the revision;
 - 2) Has the Notice of Privacy Practice available at the service delivery site for persons or his/her legal representatives to request to take with them;
 - 3) Posts the revised Notice of Privacy Practice on each page of its website. Thomas Allen encourages visitors to frequently check this page for any changes. If you have an account with <https://www.thomasalleninc.com> you may also receive an alert informing you of these changes. Your continued use of this site after any change in this privacy policy will constitute your acceptance of this change.
 - 3) Provides person or the person's legal representative with a revised Notice of Privacy Practice if the revision is effective for protected health information that Thomas Allen created or received prior to revising its Notice of Privacy Practices; and
 - 4) Thomas Allen retains this information for at least six (6) years from the date when the information was last in effect.
6. Minnesota Notice of Access to Health Records and Rights (Minnesota Health Care Records and Data Practices ACT)
- a. Thomas Allen provides a copy of its policy titled Tennessee Warning/Data Privacy to every person or his/her legal representative upon service initiation.
 - b. Thomas Allen shall make a reference to the Minnesota Notice in the Notice of Privacy Practices required by HIPAA to ensure that persons and his/her legal representatives understand the additional uses and disclosures of Protected Health Information permitted by state laws.
7. It is Thomas Allen policy to respect your privacy regarding any information Thomas Allen may collect while operating our website.

- a. Thomas Allen collects non-personally-identifying information as typically available through browsers and servers, such as browser type, language preference, referring site, and the date and time of each visitor request. Thomas Allen's purpose in collecting this information is to better understand how visitors use our website and who comprises our audience for improved and targeted content creation. Thomas Allen may use this information periodically to collect non-personally identifying information to compile analytics reports on trends in the usage of the website.
- b. Thomas Allen also collects potentially personally-identifying information like Internet Protocol (IP) addresses for logged in users and those leaving comments on www.thomasalleninc.com blog or other interactive forms that may be used, such as on the Careers page. Thomas Allen only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally-identifying information as described below, except that commenter IP addresses and email addresses are visible and disclosed to the administrators of the blog/site where the comment was left.
- c. Certain visitors to Thomas Allen's website choose to interact with Thomas Allen in ways that require Thomas Allen to gather personally-identifying information. The amount and type of information that is gathered depends on the nature of the interaction. For example, we ask visitors who sign up at www.thomasalleninc.com to provide a user name and email address. Those who engage in transactions with Thomas Allen are asked to provide additional information, including as necessary the personal and financial information required to process those transactions; only the information that is necessary or appropriate to fulfill the purpose of the visitor's interaction is collected. Thomas Allen does not disclose personally-identifying information other than as described below. Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.
- d. Thomas Allen may collect statistics about the behavior of visitors to its website. Thomas Allen may display this information publicly or provide it to others. However, Thomas Allen does not disclose personally-identifying information other than as described below.
- e. Thomas Allen discloses personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on Thomas Allen's behalf or to provide services available at our website, and (ii) that have agreed not to disclose it to others. Some of its employees, contractors and affiliated organizations may be located outside of your home country; by using Thomas Allen's website, you consent to the transfer of such information to them.
- f. Thomas Allen will not rent or sell potentially personally-identifying or personally-identifying information to anyone. Other than its employees, contractors and affiliate organizations, as described above, Thomas Allen discloses such information only in response to a subpoena, court order or other governmental request, or when Thomas Allen believes in good faith that disclosure is reasonably necessary to protect the property or rights of Thomas Allen third parties or the public at large.

- g. If you are a registered user of Thomas Allen’s website and have supplied your email address, Thomas Allen may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what’s going on with Thomas Allen and our services. If you send us a request (for example via email or one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users.
- h. Thomas Allen takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.
- i. Thomas Allen uses cookies (a string of information stored on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns) to help identify and track visitors, their usage of our website, and their website access preferences. Visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Thomas Allen website; a drawback is that certain features of the Thomas Allen website may not function properly without the aid of cookies.
- j. If Thomas Allen, or substantially all of its assets, were acquired, or in the unlikely event that Thomas Allen goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Thomas Allen may continue to use your personal information as set forth in this policy.
- k. Ads appearing on our websites may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of the most interest to you. This privacy policy covers the use of cookies by Thomas Allen and does not cover the use of cookies by any advertisers.
- l. Thomas Allen uses a Facebook Pixel, which is a piece of code obtained through Facebook and installed on our website, to track visitors use of our website and our Facebook business pages, www.thomasalleninc.com and www.thomasalleninc.com/careers. This information is used by Thomas Allen to deliver more targeted ads for our audience and audience look-a-like, enabling us to deliver ads to those persons most likely to be interested in the advertisement.