

## **Vigil's Personal Information Policy Health Insurance Portability and Accountability Act (HIPAA)**

As a key provider of technology and services to the healthcare industry, Vigil Health Solutions Inc. is implementing programs to address the transaction standards, and the privacy and security implications of the regulations announced pursuant to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). This policy describes how medical information may be used and disclosed and how personal information in our possession may be accessed.

Vigil Health Solutions Inc. (Vigil) is committed to maintaining the principles of integrity and trust with respect to the accuracy, confidentiality, and security of personal information and to maintaining compliance with the current laws and regulations governing the confidentiality and security of personal information obtained and maintained within our possession. Vigil is required by applicable federal and state laws to maintain the privacy of personal and health information. This notice explains Vigil's privacy practices and legal duties, as well as the rights of those individuals whose personal and health information has been collected.

**"Personal Information"** means any information that is identifiable as personal information, including information regarding health care and treatment; identifiable factors including name, age, address, income or other financial information.

### **We will communicate to you our purposes for collecting your personal information.**

The Vigil System is a sophisticated nurse call system that continually monitors long-term care residents' activities, and records and compiles the data from each nurse call transaction. This information is stored on the Vigil Central Computer in the facility. The information may also be stored on Vigil's remote servers in order for Vigil to provide customer support and quality improvement services, and to provide back-up services to Vigil customers.

### **We will communicate to you the methods we use to collect your personal information.**

Vigil only has access to and collects only the personal information that the health care provider, inputs into the Vigil System database and the electronic records that the computer accumulates by monitoring residents' daily activities.

### **We use recognized industry safeguards to protect personally identifiable information from unauthorized access or use.**

Vigil protects personal information by:

- Treating all personal information that we collect as confidential;
- Executing confidentiality policies and practices in our internal policies and implementing disciplinary measures for privacy violations;
- Restricting access to personal information only to those employees who need to know personal information in order to provide our services;
- Only disclosing personal information that is necessary for a service company to perform its function on our behalf, and only if that company agrees to protect and maintain the confidentiality of personal information; and
- Maintaining physical, electronic, and procedural safeguards that comply with federal and state regulations to guard personal information.

### **We only use and disclose information for the purpose for which it was collected.**

Vigil will not disclose facility residents' personal information unless we are granted permission or required to by law. Uses and disclosures, other than those listed below require authorization. If

there are other legal requirements under applicable state laws that further restrict our use or disclosure of facility residents' personal information, we will also comply with those legal requirements. Vigil may use or disclose personal information:

- To the healthcare provider for activities related to the treatment of facility residents.
- For our internal operations, including our customer service activities.
- To Third party "business associates" who perform certain activities for us. We require these business associates to give facility residents' personal information the same protections given by Vigil.
- For research purposes, stripped of identifiers, and in limited circumstances.
- When required to do so by law.
- Due to a court or administrative order, subpoena, discovery request, or other lawful process.
- To law enforcement officials.

**Our Policy and Information Practices that affect personal information may change from time to time.**

This policy is effective immediately and will remain in effect until it is revised. We reserve the right to periodically update our privacy practices and the terms of this policy at any time, provided applicable law permits such changes. For your convenience, a copy of our current policy of privacy practices is always available at [www.vigil.com](http://www.vigil.com), and you may also request a copy by contacting our Personal Information Officer.

**We will tell you how to contact us regarding our privacy statement and practices.**

While senior management is ultimately accountable, Vigil has appointed a Personal Information Officer to ensure that Vigil meets its personal information handling commitments and acts in compliance with this Policy and the Act.

Name	Contact Information
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Please contact the Personal Information Officer if you have questions regarding this policy or wish to request access to your personal information. Or if you believe we have violated any of your rights listed in this policy you may file a written complaint, clearly stating the nature of the dispute. Please contact our Personal Information Officer at [information@vigil.com](mailto:information@vigil.com) or 1-877-850-1122.