



NOTICE OF PRIVACY PRACTICES

September 2020

This Notice describes how medical information about you or your dependent may be used and disclosed and how you can get access to this information. Please review it carefully.

It's Your Information

Your Smardii health record is a Smardii asset, but it's your information.

It is our responsibility to:

- Maintain the privacy and security of your health information
- Follow the duties and privacy practices described in this notice.
- Give you a copy of this notice and be available to you if you have any questions or concerns.
- Use your information only as described here unless you tell us we can.
- Notify you promptly if your information has been compromise.

We know your health information is very personal and we are committed to protecting your privacy. This Notice applies to Smardii and its affiliated companies.

What if I have a question?

You can reach any Smardii department, team or person by calling:
+1(833)SMARDII or +1(833)762-7344.

If you have a question regarding your health care information privacy, please contact the Smardii Chief Privacy Officer at +1(833)762-7344, or email info@smardii.com.

What about other uses of my health information?

Uses and disclosures of your health information not covered by this Notice or federal or state laws that protect your health information will be made only with your written authorization.

Can I revoke my authorization to disclose information?

If you authorize us to use or disclose your health information, but you change your mind, you can revoke your authorization at any time by providing our Chief Privacy Officer a written request. We will stop sharing your information immediately upon processing your request. However, we will be unable to recall/redact any information we have already shared.



What if I believe my healthcare information rights have been violated and I want to file a complaint?

You may file a complaint with Smardii or with the Department of Health and Human Services. You will not be retaliated against for filing a complaint.

In the United States - You can file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 200 Independence Ave. S.W., Washington, D.C. 20201, calling (877) 696-6775, or visiting www.hhs.gov/ocr/privacy/hipaa/complaints/.

In Canada – (i) if you are a private sector organization, you can report breaches of security safeguards to the Office of the Privacy Commissioner (OPC) using this form: https://www.priv.gc.ca/media/4844/pipeda_pb_form_e.pdf. (ii) If you are a private individual, you can report concerns related to possible mishandling of personal information by visiting the website of the Office of the Privacy Commissioner (OPC): <https://www.priv.gc.ca/en/report-a-concern/>.

You may also contact us directly to resolve any concerns or answer questions about your healthcare information, please contact the Smardii Chief Privacy Officer at +1(833)762-7344, email info@smardii.com, or contact us by mail at this address:

Smardii
1221 Brickell Avenue
Suite #900
Miami FL 33131
USA

What if my information is lost or stolen from Smardii?

The Smardii Privacy Officer will contact you, informing you what information was lost and how best to protect yourself.

What health information may Smardii use and disclose if you do not object?

Marketing

Smardii may use your health information to send you educational materials related to your illness or condition, to advise you about certain treatment alternatives related to your illness or condition or to tell you about certain health-related benefits and services related to your illness or condition.

Family Members and Others Involved in Your Health Care

We may share your health information with your friend(s) or family member(s) involved in your medical care, once you give us permission to do so. In addition, we may disclose health information about you to an entity assisting in a disaster or pandemic relief effort (such as the



Red Cross, or governmental health organizations) so that your family and caregivers can be notified about your condition, status and location.

If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health information. We will make sure the person has this authority and can act for you before we take any action.

What information might we disclose without you agreeing or objecting?

If Required by Law

If federal, state or local laws require us to disclose your health information, we are compelled to do so.

Public Health Purposes

We may disclose your health information for public health activities. Public health activities are things such as:

- preventing or controlling disease, injury or disability.
- reporting births and deaths.
- reporting reactions to medications or problems with products.
- notification of recalls of products a person may be using.
- notifying a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition.

Abuse or Neglect

We may disclose protected health information to a public health authority or other government authority that is authorized by law to receive reports of abuse, domestic violence or neglect.

Health Oversight Activities

We may disclose your health information to an oversight agency for activities authorized by law. Examples are audits, investigations, inspections and licensure. These activities are necessary for the government to monitor the health care system, government programs and compliance with civil rights laws.

To Avert a Serious Threat to Health or Safety

Smardii may use or disclose your health information when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person.

Organ and Tissue Donation

If you are an organ donor, we may release your health information to organizations that handle organ procurement or organ, eye or tissue transplantation, or to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation.



Workers' Compensation

We may release your health information for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illnesses.

Military and Veterans

If you are a member of the armed forces, Smardii may release your health information as required by military command authorities.

Judicial and Administrative Proceedings

We may disclose your health information in response to a court or administrative order, subpoena, discovery request or other lawful process by someone else involved in the dispute.

Coroners, Medical Examiners and Funeral Home Directors

We may release your health information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death. We may also release your health information to funeral directors to carry out their duties.

Correctional Institutions

If you are an inmate of a correctional institution or under the custody of law enforcement officials, we may release your health information. This is necessary to provide you with health care, to protect the health and safety of others, or for the safety and security of the correctional institution.

National Security and Intelligence Activities

We may release your health information to authorized federal officials for intelligence, counterintelligence and other national security activities authorized by law.

Protective Services for the President and Others

We may disclose your health information to government law enforcement so they may provide protection to elected constitutional officers, heads of state or to conduct investigations.

Law Enforcement

We may release your health information if asked to do so by law enforcement officials when they are:

- trying to identify or locate a criminal suspect, fugitive, material witness or missing person.
- investigating a crime.
- investigating a death we believe may be the result of suspicious conduct.
- In necessary circumstances to report a crime — including the location or victims or the identity, description or location of the person who committed the crime.



Research

We may conduct and participate in research activities. All research projects must be approved through a special review process to protect patient safety, welfare and privacy. The review process determines whether the request for your information has met federal and state requirements to protect your information.

How might Smardii use and share my information?

We may use and share your health information for the following purposes and examples:
To ensure you get the best treatment and/or care possible.

We will share details of your health/well-being status and treatment information with your other healthcare providers.

We will share your health/well-being status and treatment information within Smardii as needed to provide the best care possible.

To receive payment for the services we provide.

Whenever applicable, we give your insurance company or your caregiver information so they can pay us for the services we provide.

Whenever applicable, planned treatments may be shared so that we can get approval for your needed services.

To improve the delivery of our care and operations.

We may use all, or part, of your health information to improve treatment methods.

We will use your health information to offer the best services to our patients and families.

We may share your health information with our business partners to evaluate our programs and facilities.

To inform you of health-related services and benefits.

So that you know about new Smardii services.

To send you educational materials about your illness or condition.

To remind you about appointments.

Your Rights Your Health Information Rights

Your Smardii health record is a Smardii asset, but it's your information. This brochure describes your rights concerning your health record.

Access to Records

You can ask to receive an electronic or paper copy of your medical record and other health information. We will provide a copy or a summary of your health information, usually within 30 days of your request. We may charge a reasonable, cost-based fee.



In rare circumstances, we may deny your request along with an explanation. If we deny your request, you may request a review by another healthcare professional, who will be chosen by Smardii, and we will comply with the outcome of the review.

Requests for Restrictions

You can ask Smardii not to share your health information for purposes of treatment, payment, or healthcare operations. You can also request a restriction of release to people involved in your care. For instance, you can request that we do not share information about a procedure or treatment.

We are not required to agree to your request, but we will try to do so and will let you know if we can. If we do agree to the restriction, we will comply with it unless the information is needed to provide emergency treatment.

If you pay for a service or healthcare item out-of-pocket in full, you can ask us not to share that information for the purpose of payment or our operations with your health insurer.

We will say “yes” unless a law requires us to share that information.

Amendments to Protected Health Information

If you believe the information we have is incorrect or incomplete, you may request an update in writing.

Smardii will review the request and notify you of our decision in writing. If approved, Smardii will update the information. We will also make a reasonable effort to notify people to whom the information was released. In case we deny the request, Smardii will provide the reason for the denial within 60 days and instructions on how to appeal.

Accounting of Disclosures

You have the right to request a report listing people and entities that Smardii shared your health information for purposes other than treatment, payment or healthcare operations.

Where can I get a copy of the Notice of Privacy Practices?

You have the right to a copy of this Notice.

We reserve the right to update and revise this Privacy Practices as necessary. If we change our Privacy Practices and Notices, we will post those changes on our website (www.smardii.com) to keep you aware of what information we collect, how we use it, and under what circumstances we may disclose it. Changes to this Privacy Practices are effective when they are posted on our website.