

## **Privacy Policy**

Welcome to the Pediatric Surgery Centers website (the “Website”). Pediatric Surgery Centers and its affiliates (“we,” “our” or “us”) are committed to protecting your privacy, so we have adopted privacy practices to protect the information we collect from you. They are described in this Privacy Policy and in our Notice of Privacy Practices for your personal health information. Our Notice of Privacy Practices, which we will provide you in connection with our services, describes our privacy practices and your privacy rights with respect to your “Protected Health Information” (as that term is defined by the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations, as amended and supplemented from time to time).

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the Website or use any of our mobile application(s) (the “App”) (collectively, the Website and App are “Sites”) and our practices for collecting and using that information.

We may modify this Privacy Policy from time to time, and if we make material changes to it, we will notify you by updating the Sites with the updated Privacy Policy. You may wish to check the Privacy Policy from time to time, because by using the Sites, by providing requested information, or by using the Sites after any changes to this Privacy Policy are posted, you consent to the collection and use of your personal information as detailed in this Privacy Policy.

### **Information Collected and How We Use It**

We collect several types of information: Personally Identifiable Information and Anonymous Information.

#### **Personally Identifiable Information**

We collect personally identifiable information you voluntarily provide on online forms which may include contact requests, referral requests, appointment requests, bill payment, comments, and/or online surveys. Personally identifiable information can include name, date of birth, address, phone number, email address, demographic information, biometric data, personal attributes, internet activity and any other information you may voluntarily provide. We will use your information to fulfill the purpose for which you provide it and for our business operations. While visiting our Sites, if you give us personally identifiable information to receive information from us, to pre-register for an event, or to pre-register for inpatient or outpatient services or otherwise, we will collect and store that personal data. If you give us personal data in order to pre-register for inpatient or outpatient services through an affiliate’s or third party’s website, the affiliate or third party may share the personal data with contracted service providers to verify the accuracy of the data and complete the registration process. For individuals seeking employment as well as current employees we will collect your name, credentials, date of birth, education/qualifications, employment terms (pay, benefits), and emergency contact details. We may use the information collected for back ground checks, payroll, preparing legally required documents (I-9 etc.)

You agree that, should you elect to supply it, we may use your name, e-mail address, physical address, telephone number, or other data to communicate with you as described below.

By providing a telephone number, you expressly consent and authorize us, as well as any of our related affiliates, agents or contractors, to contact you through the use of any dialing equipment (including a dialer, automatic telephone dialing system, and/or interactive voice recognition system) and/or artificial or prerecorded voice or message. You expressly agree that such automated calls may be made to any telephone number (including numbers assigned to any cellular or other service for which you may be charged for the call) you provide. In addition, you expressly consent and authorize the receipt of text messages from us at any telephone number (including numbers assigned to any cellular or other service for which you may be charged for the call) you provide. By providing this express consent, you specifically waive any claim you may have for the making of such calls or texts, including any claim under federal or state law and specifically any claim under the Telephone Consumer Protection Act, 47 U.S.C. § 227. By providing a telephone number, you represent you are the subscriber or owner or have the authority to use and provide consent to call or text the number.

By providing your email address, you expressly opt-in to the receipt of email communications from us and our affiliates, agents or contractors for or related to medical goods or services, your account, and other services such as financial, clinical and educational information including exchange news, changes to health care law, health care coverage, care follow up, and other healthcare opportunities, goods and services. By providing this express consent, you specifically waive any claim you may have for the sending of such emails, including any claim under federal or state law and specifically any claim under the CAN-SPAM Act, 15 U.S.C. § 7701, et seq. By providing an email address, you represent you are the subscriber or owner or have the authority to use and provide consent to contact the email address.

### **Sale of Personal Information**

We do not sell personal information that we have collected from consumers to any third parties.

### **Sources Used to Collect Personal Information**

We may collect certain information by automated means. This information includes cookies, sensors, geo location, pixel tags, IP addresses, mobile device information and other similar technology. This information does not identify you, but is statistical data that provides generic information about your use of the Sites. This information helps us understand which parts of our Sites are visited most often and may be used to analyze trends, administer and improve the Sites, gather broad demographic information, personalize content and determine retargeting and remarketing.

We use cookies to tailor web content to match your browser capability. Cookies allow the Sites to retain information to make your use of the Sites more convenient. You may refuse the use of cookies by selecting the appropriate settings on your browser, however if you disable the cookie, you will still be able to use the Sites, but you may not be able to fully take advantage of all of the Sites' features or parts of the Sites may not function properly.

Our web servers automatically identify computers by their IP addresses and this information is stored securely for your protection. We may use IP addresses to analyze trends, administer the Sites, track users' movement and gather demographic information for aggregate use. For example, if you view specific pages or download information from specific pages on our Sites, we will track and add the number of your visits to the aggregate number of visits by all users in order to better design our Sites. If you have provided personally identifiable information to us through our online forms, we may associate

some of the information we have so gathered with your personally identifiable information, and we may use this combined data to provide relevant Site and email content to you. We purchase third party information that includes name, address, census data and personal attributes for the purpose of marketing campaigns.

### **Surveys**

From time-to-time our Sites may request information from you via survey. Participation in these surveys is completely voluntary and you have a choice whether or not to disclose the requested information, which may include contact information (name and address) and demographic information (zip code and age level). Feedback collected by these surveys will be used for the purpose stated at the time the survey is posted, our business operations and monitoring or improving use of the Sites.

### **Third Party Use**

Your privacy is important to us and we want you to feel comfortable visiting our Sites. We may disclose aggregated information about our users and information that does not identify any individual without restriction in accordance with applicable laws. We may share information with third parties performing services on our behalf that are contractually bound to keep your personal information confidential and to use it only for the purposes under which we disclose it. For example, we may use service providers to help manage or support the Sites' technical operation, marketing and research firms and billing and payment processing when applicable. Also, we may share your personal information in connection with a court order, subpoena, government investigation, when required by law, and in the event of a corporate sale, merger or acquisition. If we partner with a third party to provide services and you sign up for those services, we will share your name and other contact information necessary for our partner to provide the services to you.

### **Security**

While we cannot and do not guarantee that your information will not be viewed by unauthorized persons, we take privacy and security seriously. We take reasonable, industry standard precautions to keep the Sites and their systems secure and to prevent personal information from being made available to unauthorized persons or entities. Even though we employ these standard precautions and protocols, we cannot provide absolute assurances that the contents of messages, for example, will be secure. If you choose to send any confidential information to us, you accept the risk that a third party may intercept and use this information.

### **Links**

The Sites contain links to third party websites. Please be aware that we are not responsible for any of the content, activities, products, or advertisements on these third party websites nor do we make any representations, approvals, or endorsements regarding the services provided or the nature, quality, or accuracy of such third party content. Use of any linked third party website is solely at your own risk and we encourage you to read the Terms of Use and the Privacy Policies of each such linked third party websites you choose to access.

### **Special Notice to CA Residents**

**California law provides California consumer's the right to request certain details about the categories of personal information that is collected, how certain types of their information are shared with third parties and for what business/commercial purpose. They also have the right to request that their personal information be deleted. If a California resident would like to submit a Consumer Access request they would use the link to submit their request (insert link), or email their request to [PrivacySecurityOffice@tenethealth.com](mailto:PrivacySecurityOffice@tenethealth.com), or use our toll free number 1-800-8-ETHICS.**

**Opting Out**

You may revoke your consent to contact at any time by directly contacting us at *813-490-6100* or using the opt-out method identified in the applicable communication.

Many browsers and mobile operating systems enable you to indicate your preference regarding online tracking. You can set your browser or mobile operating system to a “do not track” or similar setting and, when your browser or mobile operating system passes your request to us, we will not serve you targeted advertising, although we may continue to collect data about your use of the Sites. For example, Apple’s iOS8 mobile operating system provides iPhone and iPad users with a “Limit Ad Tracking” setting, and if you turn on that setting, we will not use your device identifier to serve you targeted ads.

**Children’s Privacy**

Our Sites are not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Sites. We do not knowingly collect or maintain personal information from children under the age of 18, and no part of our Sites is designed or intended to attract anyone under the age of 18. If you believe we might have any information from or about a child under 18, please contact us at *813-490-6100* so we can immediately delete any such information.

**Changes to Our Privacy Policy**

We will post any changes to this Privacy Policy on the Sites by a link from our homepage so that you always know what information we collect and how we use it. Please consult this portion of the Sites regularly for important changes to the Privacy Policy as they occur.

This policy is effective January 1<sup>st</sup>, 2020