



**NOTICE OF PRIVACY PRACTICES
U.S. - EU SAFE HARBOR PRIVACY STATEMENT**

**THIS NOTICE DESCRIBES HOW PERSONAL INFORMATION ABOUT YOU MAY
BE USED AND DISCLOSED, AND HOW YOU CAN GET ACCESS TO THIS
INFORMATION. PLEASE REVIEW IT CAREFULLY.**

If you have any questions about this
notice, please contact M2S: 603-298-5509

Protecting Your Personal Information

M2S is committed to protecting the privacy of your personal information. We are required by the U.S. - EU Safe Harbor Framework to maintain the privacy of your personal information, and to notify you of our privacy practices, our legal duties, and your rights concerning your personal information. This notice describes those practices, duties, and rights. In this context, Personal Information includes Personal Health Information and any information that is identifiable to you by name, address, or otherwise. For the remainder of this document we will refer to such information as PHI. We are required to follow the privacy practices that are described in this notice for as long as it remains in effect.

In general, you may visit the M2S website without identifying yourself or revealing any personal information. M2S may collect domain information from your visit to customize and improve your experience on our website.

M2S, Inc.'s Safe Harbor certification can be found at <http://web.ita.doc.gov/safeharbor/shlist.nsf/webPages/safe+harbor+list>. For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce's Website at http://www.export.gov/safeharbor/sh_overview.html.

Notice and Disclosure

We will not collect any personal information through the M2S website that you do not volunteer, and we are the sole owner of all information collected on this site. We do not sell, share, or rent this information to others in any way.

We collect Personal Health Information (PHI) from you or your health care provider in order to provide medical services and to submit claims for reimbursement of those services.



In conducting our business, we will create records regarding your health, health status, and treatment and services we provide. We collect PHI from you, your health care providers, and/or our Business Associates (defined below).

We will not use or disclose your PHI unless we are allowed or required by law to do so, or you (or your authorized representative) give us permission. Uses and disclosures, other than those listed below, require your written authorization. If there are other legal requirements under applicable laws that further restrict our use or disclosure of your PHI, we will comply with those legal requirements as well. Described below are the general types of uses and disclosures we may make without your authorization, as allowed in the Safe Harbor Framework:

- **In the vital interests of the data subject or another person**
 - a. If you are unable to consent to the disclosure of your PHI, such as in a medical emergency, we may disclose your PHI to a family member, friend, or other person involved in your care to the extent necessary for your health care or payment for your health-care. We will only make such a disclosure if we determine that it is in your best interest.
- **Necessary for the establishment of legal claims or defenses**
 - a. We may disclose your PHI in response to a court or administrative order, subpoena, discovery request, or other lawful process.
 - b. We may disclose some of your PHI under certain circumstances to law enforcement officials. If you were to be in the custody of law enforcement officials, we would have authority to disclose your PHI to such officials for health, safety, security, or related administrative purposes.
 - c. If you are a member of the U.S. Armed Forces or a foreign military force, we may disclose your PHI for military purposes under certain circumstances. We also may disclose your PHI to authorized federal officials for purposes of lawful intelligence, counterintelligence, and other national security activities.
 - d. We may disclose your PHI as legally authorized to facilitate the provision of workers' compensation or other work-related benefits.
- **Required to provide medical care or diagnosis**
 - a. We may use and disclose your PHI to facilitate medical treatment or services. In this context, we may disclose your PHI to health care providers, including doctors, nurses, technicians, medical students or others who are involved in your care.
 - b. We may use and disclose your PHI for our billing activities, including the payment of claims for services delivered to you.
 - c. We may use and disclose your PHI for our internal operations, including our customer service activities.
- **Carried out in the course of legitimate activities by a foundation, association or any other non-profit body with a political, philosophical, religious or trade-union aim and**



on condition that the processing relates solely to the members of the body or to the persons who have regular contact with it in connection with its purposes and that the data are not disclosed to a third party without the consent of the data subjects

- **Necessary to carry out the organization's obligations in the field of employment law**
- **Related to data that are manifestly made public by the individual**

Data Integrity

To ensure the reliability of the data collected, we have procedures in place to ensure data is, accurate, complete, current, and reliable for its intended use.

Security

We protect your PHI by:

- Treating all of your PHI that is collected as confidential;
- Restricting access to your PHI within M2S to those employees who need to see your PHI in order to provide services to you, such as providing the service associated with the data use agreement, or submitting a claim for a covered benefit;
- Maintaining physical, electronic/technical, and procedural safeguards that comply with federal and state regulations to guard your PHI, including:
 - a. Advanced firewall security
 - b. Fully alarmed physical perimeter security
 - c. Sophisticated data encryption algorithms
 - d. Password protected system access
 - e. Restricted visitor access
 - f. Virtual Private Networks (VPN)
 - g. Intrusion detection systems
 - h. Breach notification program

These mechanisms undergo routine evaluation and upgrade as technologies related to security and privacy improve.

Onward Transfer

We may share your PHI with individuals or organizations that perform certain activities for us, such as claims processing and other administrative activities. Our contracts with these “business associates” provide for privacy protection of your PHI.

We may use your PHI to contact you with information about health-related products and services or about treatment alternatives that may be of interest to you.



We may use and disclose your PHI for purposes of research under limited conditions. We may do this if a special privacy review group approves the use or disclosure, or if researchers need to review the PHI to determine if and how certain research should be undertaken. We also could use or disclose your PHI for research following your death, or if we removed from the PHI anything that might possibly identify you other than certain numbers or dates, and then only subject to a special privacy agreement.

In the event of your death, we may disclose your PHI to a coroner, medical examiner, funeral director, or organ, eye, or tissue procurement organization for purposes of their appropriate duties with respect to you.

We may disclose your PHI if we believe disclosure is necessary to avert a serious and imminent threat to your health or safety or the health or safety of others. We also may disclose your PHI to appropriate authorities if we reasonably believe that you are a possible victim of abuse, neglect, domestic violence or other crimes.

We may disclose your PHI to public health authorities or to the federal Food and Drug Administration if necessary to help protect the public health. We also may disclose your PHI to a health oversight agency for oversight activities authorized by law.

We must disclose your PHI when we are required to do so by law.

In circumstances other than those described above, we may use or disclose your PHI only if you (or your personal representative) provide us with a written authorization to do so. If you do provide us with an authorization, you may revoke it in writing at any time. However, your revocation will not affect any use or disclosure made consistent with the authorization while it was in effect.

Access

You have the right to request all of the following:

- **Access to Your Personal Information:** You have the right to review and receive a copy of your PHI. We may ask for verification of identity upon your request for such access to your PHI. We may charge you a reasonable fee for providing you with copies of your PHI. Your right of access does not include the right to review or obtain copies of certain records, including PHI compiled in reasonable anticipation of, or use in, a civil, criminal, or administrative action or proceeding; PHI gathered in the course of certain ongoing research; and PHI that is subject to state or federal laws that prohibit us to release such information. In addition, in certain situations when disclosure of your PHI could be harmful to you or another person, we may limit the information available to you, or use an alternative means of meeting your request. If we limit access based upon the belief that it could harm you or another person, you have the right to request a review of that decision.

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- **Amendment:** You have the right to request that we amend your PHI that is part of your medical records. Your request must be in writing, and it must identify the information that you think is incorrect and explain why the information should be amended. We may decline your request for certain reasons, including if you ask us to change information that we did not create or if we believe the PHI is accurate and complete. If we decline your request to amend your records, we will provide you a written explanation. You may respond with a statement of disagreement to be appended to the information you wanted amended. If we accept your request to amend the information, we will make reasonable efforts both to inform others to whom we have disclosed the information of the amendment and to include the changes in any future disclosures of that information.
- **Accounting of Disclosures:** You have the right to receive a report of instances in which we or our business associates disclosed your PHI for purposes other than for treatment, payment, health care operations, and certain other activities. We will provide you with the date on which we made a disclosure, the name of the person or entity to whom we disclosed your PHI, a description of the PHI we disclosed, the reason for the disclosure, and other relevant information. If you request this list more than once in a 12-month period, we may charge you a reasonable fee for creating and sending these additional reports.
- **Restriction Requests:** You have the right to request that we place additional restrictions on our use or disclosure of your PHI for treatment, payment, health care operations or on disclosures to persons you identify. We are not required to agree to these additional restrictions, but if we do, we will abide by our agreement (except in an emergency or if a use or disclosure is required by law).
- **Confidential Communication:** You have the right to request that we communicate with you in confidence about your PHI by certain specified means or to a particular location. If you advise us that disclosure of all or any part of your PHI could endanger you, we will comply with any reasonable request provided you specify in this regard.
- **Electronic Notice:** If you receive this notice on our Web site or by electronic mail (email), you are also entitled to receive this notice in written form. Please contact us using the information listed at the end of this notice to obtain this notice in written form.

Enforcement and Verification

We are committed to training all employees of the importance of complying with this policy to ensure the safety and privacy of your personal information. We will reassess our policy for compliance to the Safe Harbor Framework no less than annually, and will submit an annual recertification letter to ensure our participation on the Safe Harbor Certification list.



For dispute resolution related to the Safe Harbor Principles that can not be resolved between M2S and the Complainant, we have agreed to participate in the dispute resolution program provided by the European Data Protection Authorities Panel.

Changes to Policy

We reserve the right to revise or amend this Notice of Privacy Practices whenever there is a material change to the uses or disclosures, your rights, our legal duties, or other privacy practices stated in the Notice, within the guidelines of the Safe Harbor Framework. Any revision or amendment to this notice will be posted on our Web site and will be effective for all of your records that M2S has created or maintained in the past, and for any of your records that we may create or maintain in the future. For your convenience, a copy of our current notice of privacy practices is always available on our Web site at www.m2s.com and you may request a copy at any time by contacting us at the number below.

Contact Information

If you would like additional information regarding our Privacy Practices, or if you believe we have violated any of your rights listed in this notice, please contact our Privacy Officer at 603-298-5509. Your privacy is one of our greatest concerns and we will not penalize you or retaliate against you in any way if you choose to file a complaint.

M2S, Inc.
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