Arrendale Associates, Inc. Privacy Policy

This Arrendale Associates, Inc. ("Arrendale") privacy policy's purpose is to explain how Arrendale gathers, stores, uses and shares information provided by 1) customers using our products and 2) visitors to our website, www.aaita.com. Arrendale is committed to protecting your privacy as we serve customers and educate website visitors on our products and services.

Collection of Personal Information and Data

When you purchase Arrendale software products (Arrendale Mobile⁺ application, Transcript Advantage Plus or TA⁺, Speak-EZ and more) and elect to pay via credit card we utilize a third party, industry-leading service provider, Authorize.Net. In order for Arrendale to complete customer-initiated transactions, we may share Personal Information below with Authorize.Net. You agree and permit that Arrendale may gather, process and use information provided by you for the purpose of providing the software functionality you have requested.

Website Usage

Arrendale may observe your browser type, IP address and web preferences when you are using our website or software products in order that we may respond correctly to your user experience and respond to general software support questions.

E-Commerce and Product Registration

Authorize.Net is committed to safeguarding customer information including financial information and combating fraud. Authorize.Net operates with a mission to provide the most secure and reliable payment solutions for customers. To accomplish this, Authorize.Net dedicates significant resources toward a strong infrastructure and adheres to both strict internal security policies and industry security initiatives.

With Authorize.Net, customers can be confident their data is secure. Authorize.Net utilizes industry-leading technologies and protocols, such as 128-bit Secure Sockets Layer (SSL) and Authorize.Net is compliant with government and industry security initiatives.

Authorize.Net is regulated by the Payment Card Industry Data Security Standard. The Payment Card Industry Data Security Standard (PCI DSS) is a set of comprehensive requirements developed by the major card brands to facilitate the adoption of consistent data security measures. Each year companies renew their PCI DSS compliance. To confirm Authorize.Net's PCI compliance, please see Visa's list of compliant service providers. The following link provides a complete description of Authorize.Net's Security & Privacy Policy.

https://usa.visa.com/legal/privacy-policy.html

What Personal Information Arrendale may collect on you:

- Name
- Business address
- Telephone number
- Email address
- Titles and certifications
- Specialties
- Personal demographic data on each system user
- IP address

Arrendale does not collect or store your:

- Financial data
- Banking information
- Social Security number
- Credit score
- Any data that could be used to access your financial accounts

You consent to the acquisition and use of your Personal Information by Arrendale when you use our website, <u>https://www.aaita.com</u>, or our software products, which will only be used consistent with data protection laws and this privacy policy.

Sharing of Personal Information

Audio Files and Other Data Usage

Some Arrendale products receive audio files and other data input from various voice capture methods. These may include landline telephone, digital voice recorders, speech microphones, or mobile devices such as smartphones. As such we may employ voice to text programs provided by third parties. Audio files and other data are processed and analyzed by Arrendale applications and or third parties to tune, develop, enhance and improve Arrendale and third party products and services. Under all circumstances HIPAA and confidentiality agreements are implicit. Arrendale does not utilize or share audio files and other data except as described above.

Enabling Services.

Arrendale offers a variety of services and products through its website, listed above. Personal Information that is collected through a website may be used and/or disclosed to third parties to enable us to provide our products and services. For example, the Arrendale website may allow you to interface with a third party website or application. To facilitate that connection, we may use your Personal Information and/or disclose your Personal Information to third parties, but never share HIPAA protected information to a third party that is not a Business Associate.

Third Party Websites and Companies

The Arrendale site contains links to other websites. Arrendale is not responsible for the privacy policies or practices or the content of third party sites. Visitors should check the policy statement of other websites to understand their policies. In addition to the internal sharing of personal data, Arrendale has business associations with companies who supply related products and services. In order for these companies to supply their products or services or software as you have requested, Arrendale may provide your Personal Information. Additionally, Arrendale may provide collected statistical data that is not of a personal nature such as web traffic.

Job Applications

Arrendale posts employee and contractor career openings on our website. Arrendale uses the personal data on resumes and employment applications that applicants submit as part of our human resource hiring activities.

Online Public Forums

Consumers may post information in the public forums of blogs, Facebook and YouTube. Information posted on public areas such as these is considered public. Arrendale does not control information that is posted in public forums such as blogs, Facebook, YouTube, chat rooms and other social media on our website or other sites. Consumer opinions posted in public areas of Arrendale's website are not controlled by Arrendale. Arrendale may agree or not agree with consumer posted information or opinions; such opinions are the responsibility of the consumer authoring the content. Personal opinions and information disclosed by visitors on message boards and forums can be collected and used by others in ways beyond Arrendale's control.

Embedded Content from Other Websites and YouTube

The Arrendale website includes videos and images that are embedded from other sites. Embedded content that originates from other sites behaves in the same way as if the visitor has visited the originating website. These websites may collect data about the visitor, use cookies and other analytic tracking. Our website uses plugins from YouTube, which is operated by Google. When viewing a YouTube plugin, a connection to the YouTube servers is established. YouTube is used to better describe our products and services. Further information about how YouTube handles user data can be found at:

https://support.google.com/youtube/answer/7671399

Legal Disclosures, Mergers and Acquisitions

If required by the legal processes of governmental authorities, Arrendale may release Personal Information in order to comply with such instructions. In the event of a lawsuit, Arrendale may be required to provide Personal Information to reduce our liability or to enable protections of Arrendale or others. In the event of a future merger or acquisition Arrendale may be required to disclose Personal Information to participants during the negotiation process.

Cookies and Google Analytics

The Arrendale website uses cookies. Cookies are small files that are stored on your computer or mobile device. We use cookies to collect different types of information in order to improve our site and make it more useful, appropriate and meaningful to visitors. The cookies track the activity on our site and store the resulting information. Google Analytics is one of the analytic partners with whom the Arrendale site shares visitor data. We use the visitor data to better:

- Understand visitor preferences and profiles relating to our products and services
- Send you personal emails about new features and services
- Notify you of our participation at upcoming conferences

You are free to choose to deny the installation of these cookies on your browser/device; however, some portions of the website may load slower. Google Analytics mainly uses first-party cookies to generate reports on who visits our website and what visitors do once there. By agreeing to our privacy policy, you are also agreeing to Google's. The link below is from Google and explains their privacy policy in detail.

https://policies.google.com/technologies/partner-sites?hl=en-GB&gl=uk

Opting Out

Arrendale may offer promotional and product information and updates from time to time. We may communicate with our customers to convey this type of information via contact data that our customers and visitors have provided. Arrendale does not provide personal contact information to third parties for promotional purposes. If you would like to opt out of our marketing campaigns or have your associated data be deleted from our records, simply send us an email at privacy@aaita.com.

Children's Policy

The Arrendale website and Arrendale products and services are not directed at children. We do not knowingly collect personally identifiable information from anyone under the age of 18. We will delete any such information expeditiously upon being notified by a parent or guardian. Notify us at privacy@aaita.com.

Security

You agree that Arrendale may contact you via an email address that you provide for the purpose of relaying information about a security breach relating to the Arrendale website or an Arrendale software product. If Arrendale is made aware of a security breach, Arrendale will post a notice on the Arrendale website.

No Sharing for Other Purposes

Other than listed above, Arrendale does not share Personal Information with third parties for advertising purposes. Arrendale does not sell any of your data to any third party. All data is kept private and never shared for other purposes. Once the Arrendale Cloud based TA⁺ Workflow, Mobile⁺ application, Speak-EZ⁺ application and other Arrendale products are in use, customers are protected by Arrendale's compliance to the Health Insurance Portability and Accountability Act (HIPAA), Arrendale Software Agreements and Business Associate Agreements.

HIPAA

In accordance with federal HIPAA regulations regarding the confidentiality and privacy associated with protected health information (PHI) of patient records, employees and contractors are strictly prohibited from disclosing any information in any manner related to patients, patient's charts, dictator voice files, transcripts, or any other information that is protected under the HIPAA Act. Provider voice files, on-line transcripts and printed transcribed reports are all included in HIPAA regulations. Violations will result in disciplinary action up to and including termination of employment.

Arrendale software User ID permissions allow customers to implement and control 'Need to know' access. Arrendale requires HIPAA training for all employees and contractors upon hire, after a job change within the company and when there are any changes or amendments to HIPAA. Additionally, all employees and contractors at Arrendale must participate in periodic HIPAA training.

What Information Arrendale Software Collects on Each Patient:

When a provider dictates, Arrendale collects demographic information on each patient from the data you dictate or data you enter via our software and software interfaces from a facility host system. Arrendale software tracks all events conducted on a patient's record within our software as required by HIPAA audit rules. Arrendale software includes reporting by voice file and transcript of each event.

In the Arrendale Mobile⁺ Application and in Our Remote Hosted Software Systems:

- We use secure HTTPS connections
- We do not use cookies
- We do not collect any metadata from Google (IDs or PWs)
- We do not track what you do on the phone
- We do not track your location
- We do not track usage information
- We do not send promotions, advertisements, or emails via Mobile⁺ or smart devices
- We do not share information about the user

Your California Rights

California Civil Code Section 1798.83, permits California residents to request and obtain from us a list of what Personal Information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. Under Section 1798.83, we currently do not share any Personal Information with third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Information with third parties for marketing purposes at any time by submitting a request in writing to Arrendale Associates, Inc., c/o Ca opt-out program, 2012 Highway 160 Suite 24, Fort Mill, SC 29708 or by emailing us at **privacy@aaita.com**. It is important to note that this opt-out does not prohibit disclosures made for nonmarketing purposes or for purposes of assisting us with our own marketing.

International Customers and Visitors

Because Arrendale operates outside the US, we may transfer your Personal Information and audio and other data within our global operations to fulfill our obligations to you, but always subject to the limitations of applicable data protection laws and this Privacy Policy. Privacy laws differ internationally. Arrendale customers outside the United States may have supplemental privacy policies that may apply in those countries. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from US law, including those whose privacy laws may be more strict than US law, please note that you may be transferring your personal data to Arrendale within the United States. By providing your personal data you consent to that transfer for our services.

Enforcement and More Information

Arrendale has self-certified that it complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information from European Union member countries. Arrendale has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, please visit:

https://www.export.gov/Website-Privacy-Policy

On October 6, 2015, the European Court of Justice issued a judgment that declared invalid the European Commission's Decision 2000/520/EC of 26 July 2000 "on the adequacy of the protection provided by the safe harbor privacy principles," ("Safe Harbor"). Safe Harbor is a legal mechanism to permit transfers of EU residents' Personal Information to the United States and to ensure that the information is legally protected at a level that is considered adequate by EU standards. Since the judgment was issued, the EU and US have been in

negotiations to determine a path forward for Safe Harbor and it is expected that additional information will be available in the future.

Contacting Arrendale Associates, Inc.

If you would like to email us regarding our Privacy Policy with questions or comments, the email address is: privacy@aaita.com.

If you would like to write to us regarding our Privacy Policy with questions or comments, the mailing address is: Arrendale Associates, Inc. 2012 Highway 160 West Suite 24 Fort Mill, SC 29708

Privacy Policy last updated March 2020. Future privacy policy updates may occur and information will be updated via our website. The effective date for changes to this Privacy Policy is the date of posting.