

## **PRIVACY POLICY**

Monroe Operations LLC d/b/a Newport Healthcare (“Company”) respects your privacy. This PRIVACY POLICY (“Privacy Policy”) explains Company’s privacy practices with respect to information collected through its website, [[newportinstitute.com](http://newportinstitute.com)] (together with its features and services, the “Site”). This Privacy Policy is intended to provide you and any person helping you access or use the Site (collectively, “you” or “your”) with an overview of the following:

- The types of information about you that Company collects through the Site;
- How Company collects such information;
- How Company uses such information;
- Whether information collected about you will be shared with others;
- Company’s security measures for protecting information collected through the Site; and
- Your options with respect to the information we collect.

This Privacy Policy only applies to information collected through the Site. Company’s [HIPAA Notice of Privacy Practices](#) describes how Company uses and discloses protected health information in its capacity as a healthcare provider.

Please carefully review this Privacy Policy in its entirety. By accessing or using the Site, you are automatically accepting and agreeing to the current version of this Privacy Policy, as well as the Site’s [Terms of Use](#), and your continuing access and use of the Site reaffirms your acceptance and agreement of the foregoing in each instance.

### **Information We Collect**

Company may collect personal and non-personal information about you through the Site. As used herein, the term “personal information” means information associated with your name or personal identity. The term “non-personal information” means information and data related to your use of the Site that is not associated with your name or personal identity.

- Personal Information Collected Through the Site. The personal information collected from you through the Site may include:
  - Your first, last, and/or middle name;
  - A patient’s (or a prospective patient’s) first, last, and/or middle name;
  - Your personal contact information (e.g., mailing address, e-mail address, telephone number);
  - A patient’s (or a prospective patient’s) personal contact information (e.g., mailing address, e-mail address, telephone number);
  - Your gender;
  - A patient’s (or a prospective patient’s) gender;
  - Your date of birth;
  - A patient’s (or a prospective patient’s) date of birth;
  - Your electronic signature;
  - Your insurance information (e.g., the insured’s name, contact information, date of birth, and/or insurance member identification number, the primary subscriber’s name, contact information, and/or date of birth, and the insurance company’s name and contact information);
  - A patient’s (or a prospective patient’s) insurance information (e.g., the insured’s name, contact information, date of birth, and/or insurance member identification number, the primary subscriber’s name, contact information, and/or date of birth, and the insurance company’s name and contact information);
  - The name and/or location of the school(s) where a patient (or a prospective patient) attends;

- Billing, payment, or shipping information (e.g., payor or payee name, checking account number, credit card number, expiration date, verification code, accountholder name, cardholder name, billing address, mailing address, tax ID number);
  - Business contact information (e.g., company, title, mailing address, e-mail address, telephone number, facsimile number, tax ID number);
  - Transactional information, including but not limited to enrollment or pre-enrollment submissions, insurance verifications or applications, payments, and comments, feedback, and/or other communications made in or through the Site;
  - Information set forth in the Site's online enrollment or pre-enrollment forms, online insurance verification forms, and/or online contact or communication forms; and/or
  - Information about content and/or communications that you submit to or publish on or through the site.
- Non-Personal Information Collected Through the Site. The non-personal information collected from you through the Site may include:
    - Computer, mobile device, and/or web browser information (e.g., IP address, mobile device ID information, operating system, browser type, referring/exist web pages, web page requests, cookie information, hardware attributes, software attributes);
    - Third-party website, network, platform, server, and/or application information (e.g., Facebook, LinkedIn);
    - Usage activity concerning your interactions with the Site and/or third-party websites, networks, platforms, servers, or applications accessed through the Site (e.g., number of clicks on a page or feature, amount of time spent on a page or feature, identity of third-party websites, networks, platforms, servers, and applications being access through the Site).
- Information Collected Through Your Mobile Device. If you use your mobile device to access or use the Site, the following additional categories of personal and non-personal information may be collected from you through your mobile device:
    - The name associated with your mobile device;
    - The address associated with your mobile device;
    - The telephone number associated with your mobile device;
    - The geolocation of your mobile device;
    - The mobile device ID information;
    - With your express agreement, your mobile contacts and/or contact information (e.g., names, telephone numbers, physical addresses, e-mail addresses, photos); and/or
    - With your express agreement, information about third-party software applications on your mobile device (including, without limitation, general software apps, and online social media apps).

## **How We Collect Information**

Company may directly collect personal and non-personal information from you when:

- You register with or subscribe to the Site (e.g., by subscribing to Company's regular or promotional e-mail lists through the Site);
- You complete and submit any online enrollment, pre-enrollment, insurance verification, and/or "contact us" forms;
- You allow the Site to access, upload, download, import, or export content found on, or to otherwise interact with, your computer or mobile device (or any other device you may use to visit, access, or use the Site) or online accounts with third-party websites, networks, platforms, servers, or applications (e.g., your online social media accounts, your cloud drives and servers, or your mobile device service provider);
- You share certain content or communications from the Site with third parties; or

- Company asks you for such information, such as when you answer an online survey or questionnaire.

In addition, if you or a third party sends Company a comment, message, or other communication (such as an e-mail, letter, fax, phone call, or voice message) about you and/or your activities on or through the Site, then Company may collect any personal or non-personal information provided therein or therewith.

Finally, Company may use various tracking, data aggregation, and data analysis technologies to collect personal and non-personal information, including but not limited to the following:

- **Cookies:** Cookies are small data files (such as text files) stored on the computer or device you use to view a website, and which help store user preferences and activity. Cookies may record information you access on one page of a website to simplify subsequent interaction with that website, or to help streamline your transactions on related pages of that website. Most major web browsers are set up so that they will initially accept cookies, but you might be able to adjust your computer's, device's or web browser's preferences to issue you an alert when a cookie is downloaded, or to disable the use of some or all cookies on your computer or other devices. Please be advised that if you choose to reject all cookies, then certain areas of the Site might not function properly.
- **Web Beacons:** Web beacons are pieces of code embedded in a website or e-mail to monitor your activity on the website or your opening of the e-mail, and which can pass along information such as the IP address of the computer or device you use to view the website or open the e-mail, the URL page on which the web beacon is located, the type of web browser that was used to access the website, and previously set cookie values. Web beacons are sometimes used to collect advertising data, such as counting page views, promotion views or advertising responses. Disabling your computer's, device's or web browser's cookies may prevent some web beacons from tracking or recording certain information about your activities. Please be advised that if you disable all such cookies, then certain areas of the Site might not function properly.
- **Scripts:** Scripts are pieces of code embedded in a website to define how the website behaves in response to certain key or click requests sent by the user. Scripts are sometimes used to collect information about the user's interactions with the website, such as the links the user clicks on. Scripts are often temporarily downloaded to the user's computer or device from the website server, active only while the user is connected to the Site and deactivated or deleted when the user disconnects from the website. Please be advised that if you disable any scripts through your web browser or other means, then certain areas of the Site might not function properly.
- **Google Analytics:** Google Analytics is a digital analytics service offered by Google Inc. that tracks, measures and generates information about a website's traffic, sales, and similar information, and which may be used for statistical and marketing research. Please see <http://www.google.com/analytics> for more information about Google Analytics. We may use other third-party analytic services as well.

By visiting, accessing or using the Site, you acknowledge and agree in each instance that you are giving Company permission to monitor or otherwise track your activities on the Site, and that Company may use the aforementioned and/or other tracking, data aggregation, and data analysis technologies.

### **How We Use Your Information**

Company may use the personal and non-personal information it collects from you through the Site in a variety of ways, such as to:

- Fulfill your requests;

- Process insurance requests and/or payments;
- Facilitate your movement through the Site;
- Facilitate your use of the Site's features, products, and/or services;
- Send you communications such as administrative e-mails, promotional e-mails, answers to your questions, and updates about the Site;
- Provide you with information about Company and its businesses, products, and services by letter, e-mail, text, telephone, or other forms of communication;
- Provide you with information about third-party businesses, products, and services by letter, e-mail, text, telephone, or other forms of communication;
- Improve the Site and/or the Site's content, features, and/or services;
- Improve Company's products, services, and/or marketing efforts;
- Create new Company products, services and/or marketing efforts;
- Help personalize user experiences with the Site and/or the Site's products and/or services;
- Analyze traffic to and through the Site;
- Analyze user behavior and activity on or through the Site;
- Conduct research and measurement activities;
- Monitor the activities of you and others on or through the Site;
- Protect or enforce Company's rights and properties; and/or
- Protect or enforce the rights and properties of others.

Company also reserves the right to use your personal and non-personal information when:

- Required by applicable law, court order, or other governmental authority (including in response to a subpoena or other legal process); or
- Company believes in good faith that such use is otherwise necessary or advisable (including to investigate, prevent, or take legal action against someone who may be causing injury to, interfering with, or threatening the rights, obligations, or properties of Company, a user of the Site, or anyone else who may be harmed by such activities, or to further Company's legitimate business interests).

### **How We Share Your Information**

Company reserves the right to share your personal information with its employees, agents, administrators, and legal advisors and with third parties who help manage, administer, distribute and/or operate the Site and/or the Site's services and/or features (e.g., web hosting companies, website administrators, mobile app distribution platforms, support services companies, payment processing companies, and insurance companies), as needed in order for them to perform such services.

In addition, your name, username, and/or contact information may be disclosed in Company's membership directory or elsewhere through the Site, and/or in connection with Company's display or performance of photographs, images, and/or videos of you on or through the Site.

Company does not limit the ways in which it may use or share non-personal information because non-personal information does not identify you. For example, Company may freely share non-personal information with its affiliates, suppliers, and representatives, as well as with other individuals, businesses, and government entities.

You may choose to share certain information and/or follow other users on the Site. You may choose to share your contact information with other users or provide it publicly.

### **Data Retention**

Company may retain your personal information for as long as it believes necessary to comply with its legal obligations, resolve disputes, enforce its agreements, or as long as needed to provide you with the features, products, and/or services of the Site.

## Information Related to Transactions

In connection with any transaction that you conduct through the Site (e.g., subscribing to Company's regular or promotional e-mail lists, submitting enrollment or pre-enrollment information, submitting insurance verification information, or the purchase or sale of any products on or through the Site), you may be asked to supply certain information relevant to such transaction, including, without limitation, your name, mailing address, insurance information, date of birth, credit card number and expiration date, billing address, shipping address, phone number, and/or e-mail address. By submitting such information, you are providing your consent for Company to share such information with third parties (e.g., insurance companies, payment processing companies) for the purpose of facilitating the transaction.

## Information Collected by Third Party Applications and Networks

The Site and/or any communications sent through or as a function of the Site may contain links to third-party websites, networks, platforms, servers, and/or applications. To the fullest extent permitted by applicable law, Company is not responsible for, and you hereby release Company from any and all liability which may arise from, such third party websites, networks, platforms, servers, and applications (including, without limitation, the privacy policies and practices of such third-party websites, networks, platforms, servers, and applications, any information or misinformation found on or through such third-party websites, networks, platforms, servers, and applications, and any acts, errors, and omissions of such third-party such third-party websites, networks, platforms, servers, and applications).

You may have the opportunity to access certain third-party websites, networks, platforms, servers, or applications through the Site which may be subject to separate privacy policies pertaining to those third-party websites, networks, platforms, servers, or applications. Company may also collect information from those third-party websites, networks, platforms, servers, or applications (such as, for example, your name, gender, date of birth, and personal interests, when you "like" or click links provided by or through those third-party websites, networks, platforms, servers, or applications, and other information available through your online account or page with those third-party websites, networks, platforms, servers, or applications). It is your responsibility to carefully read, accept, and comply with the relevant terms of use and privacy policies associated with those third-party websites, networks, platforms, servers, and applications.

## How We Protect Your Information

Company has security measures in place that seek to mitigate risk and uses reasonable, appropriate and customary procedures and technologies to help protect the confidentiality of any personal information collected through the Site, such as encrypting the transmission of information through the Site by using secure socket layer (SSL) technology. However, no website can be absolutely protected against intentional or malicious intrusion attempts despite our precautions. Furthermore, Company does not control the devices, computer or network through which you access the Site or over which you may choose to send personal information, insurance or payment information to the Site, and therefore cannot prevent potential interceptions or compromises to your information while in transit to the Site. Company makes no guarantee as to the security, integrity or confidentiality of any information transmitted to or from the Site. Company is committed to safeguarding your information to the best of its ability but cannot guarantee the security of electronic communications or transmission made over the Internet.

## Your Options Regarding the Information We Collect

You may request at any time that Company provide you with an opportunity to review and change your personal information collected through the Site, or to no longer use your personal information to provide you with any products or services. Please submit any such request ("**Request Concerning Personal Information**") to any one of the following:

By mail: Newport Healthcare, Attn.: Support, 19200 Von Karman Ave Ste 500, Irvine, California, 92612-8513, with a subject line of "Your Personal Information."

By e-mail: [inquiries@newporthealthcare.com](mailto:inquiries@newporthealthcare.com), with a subject line of "Your Personal Information."

For each Request Concerning Personal Information, please state "Your Personal Information" in the e-mail or letter subject line, and clearly state the following in the body:

- a. the nature of your request;
- b. that the request is related to "Your Personal Information;"
- c. your name, street address, city, state, zip code, and e-mail address; and
- d. whether you prefer to receive a response to your request by mail or e-mail.

If you send a Request Concerning Personal Information by mail, then please do so by U.S. Certified Mail, Return Receipt Requested to allow for confirmation of mailing, delivery, and tracking. Company will not accept a Request Concerning Personal Information via telephone or facsimile. Company is not responsible for any Request Concerning Personal Information that is incomplete, incorrectly labeled, or incorrectly sent.

You are solely responsible for the accuracy and content of your personal information, and for keeping your personal information current and correct.

## Minors

The Site is not designed or intended to attract, and is not directed to, children under eighteen (18) years of age. Company does not knowingly or intentionally collect personal information through the Site from children under thirteen (13) years of age. If Company obtains actual knowledge that it has collected personal information through the Site from a person under thirteen (13) years of age, then it will refrain from further using such personal information or maintaining it in retrievable form.

Furthermore, if you are under eighteen (18) years of age, then you (or your parent or legal guardian) may at any time request that Company remove content or information about you that is posted on the Site. Please submit any such request ("Request for Removal of Minor Information") to any one of the following:

By mail: Newport Healthcare, Attn.: Support, 19200 Von Karman Ave Ste 500, Irvine, California, 92612-8513, with a subject line of "Removal of Minor Information."

By e-mail: [inquiries@newporthealthcare.com](mailto:inquiries@newporthealthcare.com), with a subject line of "Removal of Minor Information."

For each Request for Removal of Minor Information, please state "Removal of Minor Information" in the e-mail or letter subject line, and clearly state the following in the body:

- a. the nature of your request;
- b. the identity of the content or information to be removed;
- c. whether such content or information is found on the Site;
- d. the location on content or information on the Site (e.g., providing the URL for the specific web page the content or information is found on);
- e. that the request is related to the "Removal of Minor Information;"
- f. your name, street address, city, state, zip code, and e-mail address; and
- g. whether you prefer to receive a response to your request by mail or e-mail.

If you send a Request for Removal of Minor Information by mail, then please do so by U.S. Certified Mail, Return Receipt Requested to allow for confirmation of mailing, delivery, and tracking. Company will not accept any Request for Removal of Minor Information via telephone or facsimile. Company is not responsible for failing to comply with any Request for Removal of Minor Information that is incomplete, incorrectly labeled, or incorrectly sent.

## **Modification of this Privacy Policy**

Company may supplement, amend, or otherwise modify this Privacy Policy at any time without notice to you. Such supplements, amendments, and other modifications will be posted on this or a similar page of the site and shall be deemed effective as of their stated effective or modification date. It is your responsibility to carefully review this Privacy Policy each time you access or use the Site.

By accessing or using the Site you are automatically accepting and agreeing to the current version of this Privacy Policy, as well as the current version of the Site's [Terms of Use](#), and your continuing access or use of the Site reaffirms your acceptance and agreement in each instance.

## **Applicable Law**

Company controls and operates the Site from the United States. The Site is not intended to subject Company to the privacy laws or jurisdiction of any state, country or territory other than that of the United States. Company does not represent that the Site is appropriate for use in any particular jurisdiction. Those who access the Site do so at their own initiative and are responsible for complying with all local laws, rules and regulations.

## **Contact Us.**

Please direct any questions you may have about this Privacy Policy to any one of the following:

By mail: Newport Healthcare, Attn.: Support, 19200 Von Karman Ave Ste 500, Irvine, California, 92612-8513, with a subject line of "Privacy Policy."

By e-mail: [inquiries@newporthealthcare.com](mailto:inquiries@newporthealthcare.com), with a subject line of "Privacy Policy."

The foregoing contact information may change from time-to-time by supplementation, amendment, or modification of this Privacy Policy.

## **Last Modified**

This Privacy Policy was last modified on June 5, 2020.