



SCHIO Notice of Privacy Practices

[Revised May 15, 2023]

If you are a visitor to the SCHIO website, an employee, a vendor, an entity that uses SCHIO Services or an individual that enrolls directly in our data exchange Services or an individual who receives goods or services from any of the organizations SCHIO provides data exchange and other technology solutions to, this Notice may apply to you.

This privacy notice for Santa Cruz Health Information Organization dba as Serving Communities Health Information Organization, (“SCHIO,” “we,” “us,” or “our“), describes how and why SCHIO might collect, store, use, and/or share (“process“) your personally identifiable health and/or personal information when you or Provider(s) use our services (“Services“):

- Visit SCHIO website at <https://www.schio.org/>,
- Use SCHIO services to process Personal Information,
- Engage with SCHIO in other related ways, including public health, locating community resources, referrals to health care or social services agencies, marketing, or other lawful purpose.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with SCHIO policies and practices, please do not use SCHIO Services. If you still have any questions or concerns, please contact us at: SCHIOSupport@SCHIO.org.

1. INFORMATION WE COLLECT

Personal information you disclose to us:

SCHIO collects personal information that you voluntarily provide to SCHIO when you register for Services, express an interest in obtaining information about SCHIO or SCHIO Services, when you participate in activities on the Services, when you visit the SCHIO website, or otherwise when you contact SCHIO.

Personal Information Provided by You.

The personal information that SCHIO collects depends on the context of your interactions with SCHIO and the Services, the choices you make, and the features you use. The personal information SCHIO collects may include the following:

- names
- phone numbers
- email addresses
- mailing addresses
- organization you are employed by or represent
- healthcare information, including your health records, current conditions, treatment providers, care team, and health insurance
- social information, including the sources and adequacy of income, food, transportation, housing and other resources available to you



All personal information that you provide to SCHIO must be true, complete, and accurate, and you must notify SCHIO of any changes to such personal information.

Information automatically collected:

Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit SCHIO Services.

SCHIO automatically collects certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of SCHIO Services, and for our internal analytics and reporting purposes.

Like many businesses, SCHIO also collects information through cookies and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use SCHIO Services and which we record in log files. Depending on how you interact with SCHIO, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings).
- **Device Data.** SCHIO collects device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

Information collected from other sources:

In order to enhance our ability to provide relevant Services to you and update our records, SCHIO may obtain information about you from other sources, such as public databases and SCHIO network partners and persons or entities who use SCHIO Services to provide services to you. The types of information SCHIO may collect from your providers may include personally identifiable information about your healthcare, healthcare coverage, your care teams and information about your social needs, social services providers, programs you have been or are currently enrolled.

2. HOW WE PROCESS YOUR INFORMATION

SCHIO processes your information to provide, improve, and administer our Services, communicate with you or SCHIO network Providers, for security and fraud prevention, for SCHIO own internal business operations, for



regulatory audit, and to comply with applicable law. SCHIO may also process your information for other purposes with your consent.

SCHIO processes your personal information for a variety of reasons, depending on how you interact with SCHIO Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** SCHIO may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** SCHIO may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** SCHIO may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** SCHIO may process your information to send you details about our Services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** SCHIO may process your information to fulfill and manage Services we provide directly to you or on your behalf.
- **To request feedback.** SCHIO may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you informational and promotional communications.** SCHIO may process the personal information you send to SCHIO to communicate with you for informational purposes, if this is in accordance with your preferences. You can opt out of our informational emails at any time. For more information, see “[WHAT ARE YOUR PRIVACY RIGHTS?](#)” below).
- **To deliver targeted information to you.** SCHIO may process your information to develop and display personalized content and information tailored to your interests, location, and more.
- **To evaluate and improve our Services, products, marketing, and your experience.** SCHIO may process your information when SCHIO believes it is necessary to identify usage trends, determine the effectiveness of SCHIO Services, and to evaluate and improve SCHIO Services, products, communication, and your experience.
- **To identify usage trends.** SCHIO may process information about how you use our Services to better understand how they are being used so SCHIO can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** SCHIO may process your information to better understand how to provide information and promotional campaigns that are most relevant to you.

3. WHEN AND WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

SCHIO may share information in specific situations described in this section and/or with the following third parties.

SCHIO may need to share your personal information in the following situations:

- **Business Transfers.** SCHIO may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of SCHIO business to another company.



- **Business Partners.** SCHIO may share your information with your Providers to offer you certain products or services, to coordinate or deliver products and services directly to you or your representative.

You may contact us at the address below to request a comprehensive list of the healthcare and social services providers with whom SCHIO may process your information.

4. SCHIO MAY USE COOKIES AND OTHER TRACKING TECHNOLOGIES

SCHIO may use cookies and other tracking technologies to collect and store your information.

SCHIO may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in the SCHIO Cookie Notice.

5. SCHIO MAY KEEP YOUR INFORMATION

SCHIO will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, audit or other legal requirements).

When SCHIO have no ongoing legitimate business need to process your personal information, SCHIO will either delete or anonymize your personal information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then SCHIO will securely store your personal information and isolate it from any further processing until deletion is possible.

6. SCHIO IMPLEMENTS SECURITY AND PRIVACY MEASURES TO KEEP YOUR INFORMATION SAFE.

SCHIO has implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite SCHIO safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although SCHIO will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. YOUR PRIVACY RIGHTS

You may review, change, or ask us to stop sharing your personal information either by contacting your Providers directly or by sending SCHIO an OPT-OUT request to us directly at:

Please do not send any PHI through the general email.
schiosupport@santacruzhi.org
Serving Communities Health Information Organization
343 Soquel Ave PMB 327, Santa Cruz, CA 95062-2305



Withdrawing your consent: If SCHIO is relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section “HOW CAN YOU CONTACT US ABOUT THIS NOTICE?” below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor when applicable law allows or requires SCHIO to share your information, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are using an authorized agent to exercise your right to opt out SCHIO may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, SCHIO will deactivate or delete your account and information from our active databases. However, SCHIO may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, for audit purposes, to comply with or enforce our legal agreements and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or your experience with our Services. To opt out of interest-based advertising by advertisers on our Services visit <http://www.aboutads.info/choices/>.

8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, SCHIO does not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that SCHIO must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

9. CALIFORNIA RESIDENTS- SPECIFIC PRIVACY RIGHTS

If you are a resident of California, you are granted specific rights regarding access to your personal information. California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from SCHIO, once a year and free of charge, information about categories of personal information (if any) SCHIO disclosed to third parties for direct marketing purposes and the



names and addresses of all third parties with which SCHIO shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. SCHIO will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all SCHIO systems (e.g., backups, etc.).

CALIFORNIA CONSUMER PRIVACY ACT “CCPA” Notice

The California Code of Regulations defines a “resident” as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as “non-residents.”

If this definition of “resident” applies to you, depending on the Services you have received from us and the reasons we collect and/or share your Personal Information, certain rights and obligations regarding your personal information may exist.

Categories of personal information SCHIO collects

SCHIO may collect the following categories of personal information:

Category	Examples	Collect?
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES

<p>B. Personal information categories listed in the California Customer Records statute</p>	<p>Name, contact information, education, employment, employment history, and financial information</p>	<p>YES</p>
<p>C. Protected classification characteristics under California or federal law</p>	<p>Gender and date of birth</p>	<p>YES</p>
<p>D. Commercial information</p>	<p>Transaction information, purchase history, financial details, and payment information</p>	<p>NO</p>
<p>E. Biometric information</p>	<p>Fingerprints and voiceprints</p>	<p>NO</p>
<p>F. Internet or other similar network activity</p>	<p>Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements</p>	<p>NO</p>
<p>G. Geolocation data</p>	<p>Device location</p>	<p>NO</p>

H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you SCHIO services, job title, work history, and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

SCHIO may also collect other personal information outside of these categories in instances where you interact with SCHIO in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries
- To refer you to healthcare or community resources

Will your information be shared with anyone else?

SCHIO may disclose your personal information with SCHIO service providers pursuant to a written contract between SCHIO and each service provider such as a technology – software, cloud or hardware provider.



SCHIO may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be “selling” of your personal information.

SCHIO has not disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months and has no plans to do so at any time in the future.

Your rights with respect to your personal data

Right to request deletion of the data — Request to delete

You can ask for the deletion of your personal information. If you ask SCHIO to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities. If we cannot delete your information, we will take measures to stop processing your information and to stop sharing with your Providers.

Right to be informed — Request to know

Depending on the circumstances, you have a right to know:

- whether SCHIO collects and use your personal information;
- the categories of personal information that SCHIO collects;
- the purposes for which the collected personal information is used;
- whether SCHIO sell your personal information to third parties;
- the categories of personal information that SCHIO sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, SCHIO is not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights

SCHIO will not discriminate against you if you exercise your privacy rights.

Verification process

Upon receiving your request, SCHIO will need to verify your identity to determine you are the same person about whom SCHIO has the information in the SCHIO system. These verification efforts require SCHIO to ask you to provide information so that SCHIO can match it with information you have previously provided to SCHIO. For instance, depending on the type of request you submit, SCHIO may ask you to provide certain information so that SCHIO can match the information you provide with the information SCHIO already has on file, or SCHIO may contact you through a communication method (e.g., phone or email) that you have previously provided to SCHIO. SCHIO may also use other verification methods as the circumstances dictate.

SCHIO will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, SCHIO will avoid requesting additional information from you for the purposes



of verification. However, if SCHIO cannot verify your identity from the information already maintained by SCHIO, SCHIO may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. SCHIO will delete such additionally provided information as soon as SCHIO finishes verifying your identity.

Other privacy rights

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant or ask to restrict the processing of the information.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- You may request to opt out from future selling of your personal information to third parties. Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of receipt of your request.

To exercise these rights, please refer to our contact details at the bottom of this document. If you have a complaint about how SCHIO handles your data, SCHIO would like to hear from you.

10. OUR RIGHT TO UPDATE THIS NOTICE

SCHIO may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If SCHIO makes material changes to this privacy notice, SCHIO may notify you either by prominently posting a notice of such changes or by directly sending you a notification. SCHIO encourages you to review this privacy notice frequently to be informed of how SCHIO is protecting your information.

11. HOW YOU CAN CONTACT SCHIO ABOUT THIS NOTICE OR YOUR PRIVACY CONCERNS

If you have questions or comments about this notice, or wish to exercise any of your rights, please contact SCHIO:

schiosupport@santacruzhi.org

Serving Communities Health Information Organization
343 Soquel Ave PMB 327, Santa Cruz, CA 95062-2305
(831) 610-3700

Please do not send any PHI through the general email.