



## **GLENWOOD MEDICAL ASSOCIATES P.C.**

### **WEBSITE PRIVACY POLICY**

Effective Date: April 7, 2020

This Privacy Policy (the “Policy”) applies to the websites where it appears (the “Platform”). The Policy describes how Glenwood Medical Associates P.C. (“GMA”, “we”, “our”, or “us”) uses Personal Information that we collect, receive, use, treat, and store about you in connection with your use of our services and the Platform. By interacting with us you consent to the Policy.

This Policy does not govern how we collect personal health information (“PHI”). For information regarding our collecting and handling of PHI please refer to our Notice of Privacy Practices (“NPP”), which can be found [here](#) or pick up a copy of the NPP at one of our facilities.

#### **1. Types of Personal Information Collected**

We and our service providers collect a range of Personal Information. “Personal Information” is information that identifies, relates to, describes, or is reasonably capable of being associated with or linked to an individual. When we combine Personal Information with other information (i.e. information that does not, on its own, identify you), we treat the combined information as Personal Information.

We may also collect usage and device information when you visit our Platform. This may include information about the browser, operating system, and/or device identifier for the device you are using, your ISP and IP information, as well as the websites that you came from and the site you visit when you leave.

#### **2. Method of Information Collection**

We collect information in a variety of ways. We collect information directly from you; for instance when you communicate with us through our Platform or via a phone call.

We also collect information from you passively. Our Platform uses tracking tools like cookies, pixels, and web beacons. We do this both on our Platform and in emails that we send to you. Through these tools we collect information about users over time when you use our Platform. This collection includes usage and browser information. We may also have third parties collect Personal Information this way. For more information about the trackers that we use, please see Section 6 of this Policy.

We may also collect Personal Information about you from third parties (for example, our business partners, data brokers, etc.).

#### **3. Combining Information**

We may combine Personal Information we obtain. For example, we may combine information that we have collected online with information that we have collected offline, for instance during calls between you and our support team. We may also combine information that we have collected across other third-

party sites or from other third parties with information we already have. Finally, we combine information across devices.

#### **4. How We Use Personal Information**

We use your Personal Information in a number of ways. For instance, we use your Personal Information in order to process and respond to your request or questions and to perform services you have requested and/or purchased.

We may also use your information to improve our Platform and services, including to customize your experience with us. We may also use your information for marketing purposes. For example, we may send you information about new features on the Platform, new services we offer, and special offers.

Additionally, we may use information for security purposes to protect our company, Platform, and customers. Finally, we may use your information for other purposes, as permitted by law.

#### **5. Sharing Personal Information**

We may share your Personal Information in the following ways and to the following third parties:

- **Our Service Providers.** We may share your Personal Information with third parties who perform services on our behalf. For example, we may share information with vendors that operate our Platform or send out our email communications.
- **Business Partners.** We may also share Personal Information with our trusted third-party partners. For example, we may share information with partners when we co-sponsor a promotion. These partners may use your information to, among other things, send you information or contact you about services and products.
- **Companies Involved in Mergers and Acquisitions Transactions.** If we sell or otherwise transfer part or the whole of our business or assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), any information collected through the Platform, including Personal Information, may be among the items sold or transferred.
- **Fraud Investigations.** We may share your information in the course of an investigation or prevent a violation by you related to fraud, illegal or harmful activity, or contractual violation.
- **Law Enforcement, Government Agencies, and Courts.** We may disclose Personal Information at the request of law enforcement or government agencies or in response to subpoenas, court orders, or other legal process to establish, protect, or exercise our rights or to defend against a legal claim or as otherwise required or allowed by law, or to protect the rights, property, or safety of any other person.

We may also share information as described to you in other disclosures relating to additional services we provide.

#### **6. Cookies and Other Technologies**

We collect information about users over time on the Platform by using several common types of cookies and other tracking technologies including web beacons, pixels, and flash cookies. We also have third parties that collect information in this way on our behalf and for their own purposes. Cookies are small files that download when you access certain websites. For more information about cookies visit: <http://www.allaboutcookies.org/>. Web beacons, pixels, and other tracking technologies operate independent of cookies.

To assist us with analyzing our website traffic through cookies and similar technologies, we use analytics services such as Google Analytics. For more information on Google Analytics' processing of your information, please see "[How Google uses data when you use our partners' Platforms or apps.](#)" You can opt out of Google Analytics by installing [Google's opt-out browser add-on](#).

These cookies may be ones placed by us (first-party) or by a third party. These cookies may also be Flash Cookies. To learn how to manage privacy and storage settings for Flash cookies [click here](#). We may use cookies that are session-based or persistent. Session cookies expire when you close your browser or turn off your device. Persistent cookies remain on your device after you close your browser or turn off device.

We may use a variety of cookies:

<b>Type of Cookies</b>	Google Analytics, Google Tag Manager
<b>Required</b>	Required cookies are essential for the Platform to function properly and for you to navigate our Site and use its features, such as accessing secure areas of the Platform and using our services.
<b>Performance</b>	These cookies collect information about how you use the Platform, including which pages you go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies you. All information these cookies collect is aggregated and anonymous. It is only used to improve how the Platform functions and performs.
<b>Functionality</b>	Functionality cookies allow the Platform to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of the Platform after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.

You can control cookies and tracking tools. Some browsers have a “do not track” feature that prevents a website from tracking you, as well as additional cookie settings. Our Platform does not currently respond to these signals. If you choose to block cookies and other trackers, certain features of the Platform may not work. Blocking or rejecting cookies will not stop all of the tracking described in this Policy. These features and options are browser and device specific and are not uniform. You can usually find these settings in the options or preferences menu of your browser. To understand these settings, the following links for commonly used browsers may be helpful, or you can use the help option in your browser for more details:

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web and iOS.](#)

To find out more on how to manage and delete cookies, visit [aboutcookies.org](http://aboutcookies.org). For more details on your choices regarding use of your web browsing activity for interest-based advertising you may visit the following sites:

- [networkadvertising.org](http://networkadvertising.org)
- [optout.aboutads.info](http://optout.aboutads.info)
- [youradchoices.com](http://youradchoices.com)
- [youronlinechoices.eu](http://youronlinechoices.eu)

On a mobile device, you may also be to adjust your settings to limit ad tracking.

## **7. Your Choices**

You have certain choices about how we use your Personal Information. You can opt-out of certain marketing. To opt-out of marketing communication emails email us at [mkt@glenwoodmedical.com](mailto:mkt@glenwoodmedical.com) or by clicking “unsubscribe” at the bottom of our promotional communications. You will continue receiving transactional and relationship related communications, as permitted by law.

## **8. Children and COPPA**

The Platform is not intended for children. Our Platform is meant for adults and we do not knowingly collect personally identifiable information from children under 13 without permission from a parent or guardian. If you are a parent or legal guardian and think your child has given us information you can email us at [mkt@glenwoodmedical.com](mailto:mkt@glenwoodmedical.com). You can also write to us at the address listed in the “Contact Us” section of this Policy. Please mark your inquiries “COPPA Inquiry.”

## **9. Retention of Personal Data**

We reserve the right to retain your Personal Information as long as it is needed to fulfill the purposes described in Section 4 and to comply with applicable law.

## **10. Security Measures**

The security of Personal Information is important to us. We use appropriate and reasonable security measures as required by relevant law, including encryption. However, the Internet and any method of electronic transmission and storage is not 100% secure. Therefore, we cannot promise or guarantee that your use of our site or the personal data we collect about you will be completely safe. We encourage you to use caution when using the Internet.

## **11. Links to Third Parties and their Sites**

Our Platform may include third party content and links to third party websites and services that collect Personal Information. We do not control these third parties and this Policy does not apply to their privacy practices. We are not responsible for the practices of these third parties or how they use information you provide to them. Please read the third parties’ privacy policies carefully.

## **12. Contact Us**

If you have questions about this Policy or our privacy practices, please email us at [mkt@glenwoodmedical.com](mailto:mkt@glenwoodmedical.com). You may also write to use at:  
Glenwood Medical Associates, P.C.  
1830 Blake Ave.  
Glenwood Springs, Colorado 81601

## **13. Updates**

We may from time-to-time change our privacy practices. Unless otherwise indicated, any changes to this Policy will apply immediately upon posting to the Platform so please check our site periodically for updates. You can see when this Policy was last updated by reviewing the “Last Updated” legend at the top of this page. We will provide notice of material changes by communicating with you in the manner and format in which we typically communicate with you in our regular course of business, or as required by applicable law.