# **Darena Solutions Privacy Notice**

Based on the HealthIt.gov Model Privacy Notice:

https://www.healthit.gov/topic/privacy-security-and-hipaa/model-privacy-notice-mpn

For detailed guidance on how we handle your health data<sup>1</sup>, see our Privacy Policy.

**Note**: "We" refers to Darena Solutions, and "you/your" refers to the user/consumer of MeldRx™, MyMeldRx™, MyMipsScore™, or our Cures Act certified solution BlueButtonPRO.

HIPAA	
This health technology developer is a HIPAA covered entity	

#### Use: How we use your data internally

Primary Service: Our app is used primarily to promote and facilitate the interoperability of healthcare records based on guidance from the U.S. Department of Health and Human Sciences and the 21<sup>st</sup> Century Cures Act.

We collect and use your identifiable data<sup>2</sup> to:

- Provide the primary service<sup>3</sup> of the app or technology
- X Develop marketing materials for our products
- X Conduct scientific research
- X Support company operations (e.g., quality control or fraud detection)
- X Develop and improve new and current products and services (e.g., analytics<sup>4</sup>)
- X We DO NOT collect and use your identifiable data

#### Share: How we share your data externally with other companies or entities

Note: We will **never** share data without your consent.

We share your identifiable data<sup>2</sup> to:

- Provide the primary service<sup>3</sup> of the app or technology
- X Develop marketing materials for our products
- Conduct scientific research
- X Support company operations (e.g., quality control or fraud detection)
- X Develop and improve new and current products and services (e.g., analytics<sup>4</sup>)
  - We DO NOT share your identifiable data<sup>2</sup>

We share your data AFTER removing identifiers (note that remaining data may not be anonymous) to:

- X Provide the primary service<sup>3</sup> of the app or technology
- X Develop marketing materials for our products
- X Conduct scientific research
- X Support company operations (e.g., quality control or fraud detection)
- X Develop and improve new and current products and services (e.g., analytics<sup>4</sup>)
- We DO NOT share your identifiable data after removing identifiers

Sell: Who we sell your data to	
We sell your identifiable data <sup>2</sup> to some or all of the following: data brokers <sup>5</sup> , marketing firms, advertising firms, or analytics firms.	<ul> <li>X Yes, automatically</li> <li>X Yes, only with your permission</li> <li>No, we DO NOT sell your data</li> </ul>
We sell your data AFTER removing identifiers (note that remaining data may not be anonymous) to some or all of the following: data brokers <sup>5</sup> , marketing firms, advertising firms, or analytics firms.	<ul> <li>Yes, automatically</li> <li>Yes, only with your permission</li> <li>No, we DO NOT sell your data</li> </ul>

Store: How we store your data	
We store your data on your device	
We store your data outside the device at our company or through a third party	• ✓ Yes • X No

Encryption <sup>6</sup> : How we encrypt your data	
We encrypt your data in the device or app	<ul> <li>X Yes, automatically</li> <li>X No</li> <li>V N/A</li> </ul>
We encrypt your data when stored on our company servers or with an outside cloud computing <sup>7</sup> services provider	<ul> <li>Yes, automatically</li> <li>X No</li> <li>X N/A</li> </ul>
We encrypt your data while it is transmitted	<ul> <li>Yes, automatically</li> <li>X No</li> <li>X N/A</li> </ul>

Privacy: How this technology accesses other data	
The technology or app requests access to other device data or applications, such as your phone's camera, photos, or contacts	
The technology or app allows you to share the collected data with your social media accounts, like Facebook	•

User Options: What you can do with the data that we collect	
The technology or app allows you to access, edit, share, or delete the data we have about you	• Ves. You can
	<ul> <li>Access your data</li> </ul>
	o 🔽 Edit your data
	o 🔽 Share your data
	o 🔽 Delete your data
	• X No

### Deactivation8: What happens to your data when your account is deactivated

When your account is deactivated/terminated by you or the company, your data is...

- X Deleted immediately
- X Permanently retained and used
- Retained and used until you request deletion

### Policy Changes: How we will notify you if our privacy policy changes

If our Privacy Policy changes, a communication will be sent to you with a link to the updated privacy policy. To continue using the application, the new privacy policy must be read and agreed to.

## Breach<sup>9</sup>: How we will notify you and protect your data in case of an improper disclosure

Darena Solutions complies with all applicable laws regarding breaches. In the event of a security or data breach, we have an incident response team on standby that will coordinate any investigations and notifications to affected parties.

#### **Contact Us**

**Darena Solutions** 

Website: <a href="https://www.darenasolutions.com">https://www.darenasolutions.com</a>

Privacy Policy: <a href="https://www.darenasolutions.com/privacy-policy">https://www.darenasolutions.com/privacy-policy</a>
Contact Form: <a href="https://www.darenasolutions.com/contact">https://www.darenasolutions.com/contact</a>

Email: support@darenasolutions.com

Location: St. Louis, MO, United States of America

- <sup>1</sup> Health data can include but is not limited to: wellness information (e.g., exercise or fitness habits, nutrition, or sleep data), health markers (e.g., blood pressure, BMI, or glucose), information on physical or mental health conditions, insurance or health care information, or information that integrates into or receives information from a personal health record.
- <sup>2</sup> **Identifiable data means**: data, such as your name, phone number, email, address, health services, information on your physical or mental health conditions, or your social security number, that can be used on its own or with other information to identify you.
- <sup>3</sup> Service refers to any of our applications that you are using, such as MeldRx, MyMeldRx, MyMipsScore, or BlueButtonPRO.
- <sup>4</sup> Analytics means: the process of examining data to draw conclusions from that information.
- <sup>5</sup> Data broker means: companies that collect personal information about consumers from a variety of public and non-public sources and resell the information to other companies.
- <sup>6</sup> Encryption means: a method of converting an original message of regular text into an encoded text in such a way that only authorized parties can read it.
- <sup>7</sup> Cloud computing means: a kind of Internet-based computing that provides shared processing resources and data to computers and other devices on demand.
- <sup>8</sup> Deactivation means: an individual takes action or a company ceases operation or deactivates an individual's account due to inactivity.
- <sup>9</sup> Breach means: an unauthorized disclosure.