

Combined Privacy Policy and HIPAA Notice of Privacy Practices

Effective Date: 9/16/2025

This policy describes how Upward Smiles, Inc. ("we," "us," or "our") uses, protects, and discloses your information. This includes Protected Health Information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA) and other personal information collected through our services.

Part 1: HIPAA Notice of Privacy Practices (for PHI)

This section is required by federal law and provides a detailed account of your rights concerning your PHI.

Your Protected Health Information (PHI):

PHI is individually identifiable health information created, received, maintained, or transmitted by us. It includes demographic information and information relating to your past, present, or future physical or mental health or condition and related healthcare services.

Your Rights:

As our patient, you have the right to:

- **Request restrictions** on certain uses and disclosures of your PHI. We are not required to agree to all requests but will consider them.
- **Request confidential communications** of your PHI by alternative means or at alternative locations.
- **Inspect and receive a copy** of your PHI, including medical and billing records.
- **Request an amendment** to your health information if you believe it is incorrect or incomplete.
- **Receive an accounting of disclosures** of your PHI for purposes other than treatment, payment, or health care operations.
- **Receive a copy of this notice** in paper or electronic form.
- **Receive notification** if there is a breach of your unsecured PHI.

Our Responsibilities:

We are required by law to:

- Maintain the privacy and security of your PHI.
- Provide you with a copy of this notice.
- Notify you if a breach occurs that compromises the privacy or security of your PHI.

How We May Use and Disclose Your PHI:

- **Treatment:** We may use and disclose your PHI to provide, coordinate, and manage your healthcare. For example, a doctor may share your medical records with a specialist.
- **Payment:** We may use and disclose your PHI to bill and collect payment for the services we provide to you.
- **Healthcare Operations:** We may use and disclose your PHI for business activities, such as quality assessment and compliance auditing.



- **Business Associates:** We may share your PHI with third-party vendors who perform functions on our behalf. These vendors must sign a Business Associate Agreement (BAA) and are also required to protect your PHI.
- **Other disclosures:** We may also share your PHI with law enforcement, public health authorities, or in judicial proceedings, as required by law.

Part 2: General Privacy Policy (for other information)

This section describes how we collect, use, and share information not subject to HIPAA.

Information We Collect:

We may collect information you provide directly to us (e.g., name, phone number, email address) and information collected automatically when you use our website or services (e.g., IP address, browser type).

How We Use Your Information:

We use your information to:

- Communicate with you about our services.
- Improve our website and services.
- Conduct internal business analysis.
- Comply with legal requirements.

Information Sharing:

We do not sell or rent your personal information to third parties for marketing purposes. We may share your information with third-party service providers who assist us with our business operations, provided they are contractually obligated to keep your information confidential.

Part 3: Text Messaging and Communication Policy

This section details the use of text messaging for communications, addressing both general and HIPAA-specific requirements.

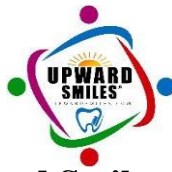
Consent for Text Messaging:

By opting in to our text message service, you provide your explicit consent to receive text messages from us. This consent covers both informational messages and, if you are a patient, certain healthcare-related communications.

Patient Communications (HIPAA):

- **Secure Platform:** We use a dedicated, HIPAA-compliant messaging platform for any text messages containing Protected Health Information (PHI). Standard SMS is not secure and is not used for confidential patient information.
- **Minimum Necessary Information:** When sending patient-related text messages, we adhere to the "minimum necessary" standard, sharing only the information required for the immediate purpose.
- **Information Disclosed:** Examples of text messages that may be sent include appointment reminders, scheduling changes, and billing notifications. We will never include detailed medical information in a text message.

2820 ANCHOR DR.
FARMINGTON, MO 63640



Upward Smiles, Inc.®
www.upwardsmiles.com

660 N. CREEK DR.
FESTUS, MO 63028

- **Risks:** You acknowledge that text messaging, even via a secure platform, carries inherent risks. You agree to these risks when you consent to text communications. We recommend securing your device with a password to protect your privacy.
- **Documentation:** All text message communications are logged and archived on our secure platform for audit and record-keeping purposes.

General Communications (Non-HIPAA):

- For non-patient communications, we may use standard SMS for general updates or promotions.
- **Standard Rates:** Standard message and data rates may apply.
- **Opt-Out:** You can opt-out of our text message service at any time by replying **STOP** to any message you receive.

Unsubscribing from Text Messages:

- To stop receiving all text messages, reply **STOP** to any message. We will process your opt-out request promptly.
- If you are a patient, you can also inform our office directly to update your communication preferences.

Mobile Opt-In Information Sharing:

We do not sell or rent or share your mobile opt-in data, or SMS consent, with third parties or affiliates.

Changes to This Policy:

We reserve the right to amend this combined privacy policy at any time. We will post the revised policy on our website and, if the changes are material, will notify you before