

Epione Privacy Policy

Last Updated: July 2021

Your privacy is important to us. This privacy policy (“Privacy Policy”) explains the data EpioneMD, LLC, (“Epione”, “we”, “our” or “us”) collects, uses and stores when an individual (“you” or “your”) uses or accesses our website <https://epionemd.com> (the “Website”). By accessing or using the Website, you are consenting to the practices described in this Privacy Policy. You can withdrawal your consent at any time by stopping your use of the Website.

Personal Information We Collect

We collect data from you through the Website and other interactions you have with us. You provide some of this information directly to us via the Website, and we get some of it by collecting data about your interactions, use, and experiences with the Website.

Personal information is data that can be used to identify or contact an individual person. Epione has collected the following categories of personal information from its users in the last twelve (12) months:

Categories	Examples
Identifiers	Name, email address, phone number, address, IP address, or other similar identifiers
Customer records information	Primary care giver information, health care provider information, medical Information *
Characteristics of protected classifications	Ethnicity, date of birth, gender identity
Internet or other electronic network activity information	Browsing history, search history, and information regarding a user’s interaction with the Website
Geolocation data	Physical location, generally

* Medical Information may also constitute Protected Health Information or PHI. How we use PHI is more fully described in our [Notice of Privacy Practices](#). To the extent there is any conflict between this Privacy Policy and the Notice of Privacy Practices, the Notice of Privacy Practices will control.

How and for What Purposes Epione Uses Personal Information

Personal information you provide to us is used to help us communicate with you and to provide you with the advanced care planning and serious illness support palliative care coaching services available via the Website (“Services”). For example, we use personal information to: (i) create and administer the Services and the Website; (ii) send you communications regarding the Services; (iii) provide technical support; (iv) respond to your inquires; and (v) improve and manage the Services and the Website.

We also use the data to operate our business and meet our legal obligations. When we ask you to provide personal information, you can decline, but if you do, you may not be able to access the Website. We do not sell any personal information to any third party.

Non-Personal Information

We also collect data in a form that does not, on its own, identify any specific individual (non-personal information). We may collect, use, transfer, and disclose non-personal information to improve the Website and customize the user experience, or for any other legitimate purpose. We also may aggregate non-personal information in order to track trends and analyze use patterns on the Website. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as language, zip code, area code, unique device identifier, referrer URL, or location so that we can better understand user behavior and improve our Website and Services.
- We may collect information regarding user activities on our Website. This information is aggregated and used to help us provide more useful information to our users and to understand which parts of our Website are of most interest. Aggregated data is considered nonpersonal information for the purposes of this Privacy Policy.
- We may collect and store details of how you use our Website, including search queries. Except in limited instances, such information will not be associated with your IP address.

This Privacy Policy does not limit our use or disclosure of non-personal information and we reserve the right to use and disclose non-personal information to our partners and other third parties at our discretion (including aggregated and/or anonymized information about our users and their use of the Website). We do not use or respond to “do not track” signals that may be sent from your web browser. If we do combine non-personal information with personal information, the combined information will be treated as personal information for as long as it remains combined.

Cookies and other Technologies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our Website, we may collect information from you automatically through cookies or similar technology. Specifically, Epione uses third parties’ analytic and tracking tools to better understand who and how people are using the Website and how to improve the effectiveness of the Website. Third party companies may use cookies, pixel tags or other technologies to collect and store anonymous information, such as time of visit, pages visited, time spent using the Website, device identifiers, type of operating system used and other website(s) you may have visited. They might combine information they collect from your interaction with the Website with personal information they collect from other sources. We do not have access to, nor control over, third parties’ use of cookies or other tracking technologies.

For instance, we use Google Analytics, a web analytics service provided by Google, Inc. (“Google”), to assist in providing the Website. Google Analytics uses cookies to help us analyze how users use the Website. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to, and stored by, Google on their servers. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on website activity for us and providing other services relating to website activity and Internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of the Website. By using the Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Sharing information with Third Parties

We may engage third parties to facilitate the Website or to perform Website-related services (e.g., , database management, and improvement of the Website’s features) or to assist us in analyzing how our Website is used. Over the last twelve (12) months, we have disclosed the following categories of personal information to third parties to help us with our Website: identifiers, customer records information, and characteristics of protected classifications. These third parties may have access to your personal information, but only to the extent needed to perform these tasks on our behalf, and we will contractually require them to protect and safeguard your personal information in accordance with applicable laws.

Messaging

By providing your email address through the Website, you expressly consent to receive informational messages about the Website at the email address provided to Epione. You may unsubscribe from these emails at any time.

Others

It may be necessary for Epione to disclose your personal information by law, legal process, litigation, and/or requests from public and governmental authorities. We may also disclose information about you, but only where there is a lawful basis for doing so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our Website or users. This could include providing information to public or governmental authorities. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

Protecting and Storing Your Personal Information

Epione and our service providers implement security measures designed to protect your information from unauthorized access, disclosure or accidental loss or destruction. We utilize appropriate physical, technical and managerial safeguards designed to protect the information we collect from or about our users. We store your personal information on WordPress, Bluehost, and Healthie. Epione will keep your personal information until you request that we delete your personal information or we cease providing the Website. Once either of these events occurs, we will delete your personal information using industry recognized standards to delete data.

Your Privacy Rights

You can make choices about our collection and use of your information. You can control your personal data that Epione obtains, and exercise your data protection rights, by contacting Epione or using various tools we provide. For example, you can:

- Use the “unsubscribe” links contained in our email messages to stop receiving messages from us via email.
- Prevent the Website from obtaining your location by disabling location services on your device. However, doing so means you may not be able to use the Website.

Not all personal information processed by Epione can be accessed or controlled via the tools above. If you want to access or control personal data processed by Epione that is not available via the tools above, you can always contact Epione at ashwini.bapat@epionemd.com.

California

If you are a California resident, the California Consumer Protection Act provides you with specific rights regarding your personal information. You have the right to:

- Request that Epione disclose to you the categories and specific pieces of personal information we have collected.
- Delete any personal information about you which Epione has collected from you.
- Request that Epione also disclose the following to you:
 - The categories of sources from which your personal information is collected
 - The business or commercial purpose for collecting your personal information
 - The categories of third parties with whom Epione shares personal information

To exercise the rights set forth above, you may submit a request to us by emailing us at ashwini.bapat@epionemd.com.

If you choose to exercise your privacy rights, you have the right to not to receive discriminatory treatment or a lesser degree of service from Epione.

Our Policies Concerning Children

You must be 18 years or older in order to use the Website. We do not knowingly collect or use personal information from anyone under 18 years of age. If we become aware that anyone under-age has provided us with personal information, we will delete that information.

Changes to our Privacy Policy

We may occasionally update this Privacy Policy. When we do update this Privacy Policy, we will also revise the “Last Updated” date at the top of the Privacy Policy. If we make changes to this Privacy Policy that, in our discretion, we consider significant, we will post the updated Privacy Policy on the Website and we may also send e-mails to our users containing a link to the revised Privacy Policy. Please review this Privacy Policy periodically to stay informed about how we are protecting the Personal Information we collect. If you continue to use the Website after we post an update to this Privacy Policy, you are indicating your acceptance of the updated Privacy Policy.

How to Contact us

If you have any questions about this Privacy Policy, the personal information we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to email us at ashwini.bapat@epionemd.com, or call us at 1-551-486-9539, or write to us at 843 Acton Street, Carlisle, MA 01741.