

My Health My Data Policy

The Washington Consumer Health Data Privacy Policy (“Policy”) applies to personal data defined as “Consumer Health Data” by the Washington My Health My Data Act (“MHMD”) that is collected from you by Pima Medical Institute’s Healthcare System (“Pima”, “we,” “us,” or “our”). The Policy should be read in conjunction with Pima’s [Website Privacy Policy](#). If a conflict exists between the Policy and any other policy, statement, notice or other document published by Pima, the Policy is controlling as to Consumer Health Data Collected under MHMD. For the purposes of the Policy, unless otherwise noted, all references to Pima include the Pima website, applications developed by Pima, and other interactions with Pima through which Consumer Health Data may be collected.

Consumer Health Data under MHMD means personal information that is linked or reasonably linkable to a consumer that identifies the consumer's past, present, or future physical or mental health status. The Policy does not apply where an exception or exemption applies such as for Protected Health Information (“PHI”) under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). Excluding the Dental clinical operated by Pima Medical Institute and the Veterinary Assistant and Veterinary Technician programs, Pima does not require health records; however, clinical affiliates with whom we partner may require personal health data and Pima may collect and share this information directly with the affiliate, and supplemental documentation may be requested for students’ request for accommodations, or drug and alcohol testing. Additionally, students may participate in educational activities where health data is collected as part of the course objectives or skills.

Consumer Health Data We Collect

As described in the Pima’s [Website Privacy Policy](#), the personal data we collect depends on the context of your interactions with Pima, the choices you make, the tools and features you use, your location, and applicable law. Consumer Health Data is broadly defined and some of the categories of data we collect would be consumer health data if they were not excluded from MHMD.

We may collect the following categories of personal information, which may be Consumer Health Data if not excluded from MHMD:

- Information about your health-related conditions, symptoms, status, diagnoses, testing, vaccination or immunization status, or treatments (including surgeries, procedures, medications, or other interventions);
- Measurements of bodily functions, vital signs, or characteristics, including genetic data and biometric information;
- Use or purchase of prescribed medication;
- Precise location information that could reasonably indicate your attempt to acquire or receive health services or testing;
- Internet or Network Activity Information essential to running our website such as Internet Protocol (IP) address, Media Access Control (MAC) address, operating system and version, and Internet browser type and version which could identify your attempt to seek

health care services or information, including services that allow you to assess, measure, improve, or learn about your or another person's health; and

- Other information that may be used to infer or derive data related to the above or other health information.

These categories of personal information are specifically excluded from MHMD when collected by Pima for medical care, research, and other Pima operations. Examples of data we collect that are excluded from MHMD include:

- Personal data defined as Protected Health Information (“PHI”) under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”);
- Health care information collected, used, or disclosed in medical records (chapter [70.02](#) RCW);
- Substance Use Disorder Patient Records (42 C.F.R. Part 2);
- Personal data used or shared in research (45 C.F.R. Part 46 and 21 C.F.R. Parts 50 and 56)
- Information and documents created specifically for and collected and maintained for Pima's Quality Improvement;
- Information that is de-identified as defined in HIPAA and information derived from such de-identified data; and
- Information used only for public health activities and purposes and Limited Data Sets as described in HIPAA.

Sources of Consumer Health Data

Pima does not collect your Consumer Health Data unless you voluntarily provide it to us. We may collect personal information, including Consumer Health Data, from the following categories of sources:

- Directly from you when you use our services, participate in lab activities while attending a Pima program or event, engage with customer service, provide health data required by a clinical affiliate in order to participate in a clinical experience / course, and any other way that you may be able to interact with us. With your permission, we may also collect Consumer Health Data from another source provided by you like your connected device or profile.
- From third-party sources including Pima affiliates, other medical providers, contracted service providers, and business associates as defined under HIPAA. We may engage third-party service providers to provide certain interactive features. By using these features, you understand that our vendors may process the information obtained through the feature to provide the Services on our behalf.
- From websites and mobile applications and automatically from devices you use to connect to our Services. For more information about this, please see our [Website Privacy Policy](#), and any Privacy Policies and Terms of Use specific to individual mobile applications.

Use of Your Consumer Health Data

In general, some operations of Pima, such as the Seattle dental clinic, do not use Consumer Health Data as defined in MHMD because the personal data we use related to medical care,

research, and other operations are specifically excluded from MHMD. Other uses include sharing health care data to healthcare related clinical affiliations, where required; as part of the process of consideration when a student requests accommodations, only when applicable; drug and alcohol testing, only when applicable; confirming vaccination information to meet accrediting agency requirements; and collection of data during educational related activities. Those other uses of personal data collected by Pima are described where those data are collected, including in our [Website Privacy Policy](#), and other privacy notices and terms that provide disclosures about personal information.

To the extent we collect personal information, including Consumer Health Data, as described above, we may use it for the following purposes:

- To provide you with the medical, research, or educational services you have requested or authorized,
- Delivering the services and their features, including personalization of certain features,
- Ensuring the secure and reliable operation of the services and the systems that support them including troubleshooting and improving the services,
- Essential business operations that support the provision of the services such as analyzing our performance, meeting our legal obligations, developing our workforce, and conducting research and development, and
- Other purposes for which we give you choices or obtain your consent as required by law – for example, for advertising or marketing purposes.

Where we require your consent to collect personal information for a specified purpose, a description of those purposes is provided to you at the time of collection.

Sharing Consumer Health Data With Third Parties

Some of the data Pima shares is excluded from MHMD. Pima will only share your Consumer Health Data with employees and trusted partners and only for the services you have consented to or to the extent necessary to provide a product or service that you have requested or comply with applicable law. All such third parties are prohibited from using your Consumer Health Data except to provide these services to Pima and they are required to maintain the confidentiality of your Consumer Health Data.

As necessary for the purposes described above, we may share personal information, including Consumer Health Data, with following categories of third parties:

- Affiliates. We enable access to data across our subsidiaries, affiliates, and related companies, for example, where we share common data systems or where access helps us to provide our services and operate our business.
- Service providers. Vendors or agents (“processors”) working on our behalf may access Consumer Health Data for the purposes described above.
- Accrediting agencies. We may share confirmation of verification for required vaccinations, such as the Rabies vaccination for the Veterinary Assistant and Veterinary Technician programs.

- Business partners. We may share Consumer Health Data with other companies, for example, where you use a service that is cobranded and jointly operated with another company, or where you use our services to interact with another company.
- Government agencies. We disclose data to law enforcement or other government agencies when we believe doing so is necessary to comply with applicable law or respond to valid legal process.
- Other third parties. In certain circumstances, it may be necessary to provide data to other third parties, for example, to comply with the law or to protect our rights or those of our customers.
- Other users and individuals. If you use our services to interact with other users of the service or other recipients of communications, we will share data, including Consumer Health Data, as directed by you and your interactions.
- The public. You may select options available through our services to publicly display and disclose certain information, such as an endorsement, demographic data, content and files, or other data, which may include Consumer Health Data.

How to Exercise Your Rights

MHMD provides certain rights with respect to Consumer Health Data, including the right to access, delete, or withdraw consent relating to your consumer health data, subject to certain exceptions. You may exercise any of your rights by contacting us directly using the contact details found in the Policy. The written request should include sufficient information to verify your identity and specify the right you wish to exercise. For any questions or assistance, you may also reach out using the contact information below.

If your request to exercise a right under the MHMD is denied, you may appeal that decision by contacting our legal team. If your appeal is unsuccessful, you can raise a concern or lodge a complaint with the Washington State Attorney General at www.atg.wa.gov/file-complaint.

Changes to The Policy

Pima reserves the right to change the Policy from time to time. For example, when there are changes in our services, changes in our data protection practices, or changes in the law. When changes to the Policy are significant, we will inform you through the Policy page.

Contact Information

All notices or requests should be written and given by email and: (i) personal service (which, for the purposes of the Policy, shall include courier/overnight delivery); or (ii) by certified mail to:

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