

ARIA Home PT Clinician Privacy Policy

The terms “**S+N**,” “**we**,” “**our**,” and “**us**” include Smith & Nephew, Inc. and our affiliates.

The Privacy Policy explains how we collect, use, disclose, and secure information we obtain through the ARIA Home PT online clinician dashboard (the “**Service**”) from and about you, except for identifiable patient information. This Privacy Policy applies to the Service and does not relate to S+N’s website or other information collection. S+N’s website privacy policy is available here.

Identifiable patient information is treated as Protected Health Information (“**PHI**”) (as defined at 45 C.F.R. § 160.103) regulated by the Health Insurance Portability and Accountability Act of 1996, as amended, and its implementing regulations (“**HIPAA**”). Identifiable patient information is handled by S+N in accordance its HIPAA business associate agreements with its customers.

THE SERVICE COLLECTS YOUR INFORMATION

Account Information. To have an account, you may need to provide information about yourself, the organization you are from, and/or the practice(s) you are working for or with, such as the organization name, your organization email address, postal address, professional registration with your state regulator, user name, user password, and/or user’s position at the practice or organization. You may also provide other optional information.

Using the Service. We collect information you provide through the Service.

Communicate with Us. We collect information about you through your communications with our customer-support team or through other communications with us.

Automatic Data Collection: Cookies and Related Technologies. When you visit our Service or open our emails, we and our third-party partners collect certain information by automated means, such as cookies, web beacons and web server logs. By using the Service, you consent to the placement of cookies, beacons, and other similar technology in your browser and on emails in accordance with this Privacy Policy. The information collected in this manner includes IP address, browser characteristics, device IDs and characteristics, operating system version, language preferences, referring URLs, and information about the usage of our Service. We may use this information, for example, to determine how many users have visited certain pages or opened messages or newsletters, or to prevent fraud. We may link this data to your profile. Our partners also may collect and combine information collected on our Service and emails with other information about your online activities over time, on other devices, and on other websites or apps, if those websites and apps also use the same partners. You may be able to change browser settings to block and delete cookies when you access the Service through a web browser. To find out more about cookies, visit www.aboutcookies.org. However, if you do that, the Service may not work properly. The Service does not respond to browser do-not-track signals.

HOW S+N USES YOUR INFORMATION

Internal and Service-Related Usage. We use information for internal and service-related purposes and to improve the Service and our products and services. We handle information about you in accordance with the agreement we have in place with the provider that

authorized your account (“**S+N Customer**”). We handle PHI you submit in accordance with the agreement and BAA we have in place with the S+N Customer.

Communications. We may send emails to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, system maintenance, and other Service-related purposes.

Marketing. We may use information about you and your use of the Service for marketing purposes, such as sending you information we think may be useful or relevant to you. You may opt out of email marketing by using the unsubscribe link in a marketing email.

Anonymized and/or Aggregate Data. We anonymize and/or aggregate data collected through your use of the Service and may use and disclose it for internal business purposes and as otherwise permitted in our agreements with you and/or the practices you are working for or with.

S+N MAY DISCLOSE YOUR INFORMATION

We Use Vendors and Service Providers. We share information we receive with vendors and service providers that perform services for us. For example, we will share your information with service providers, such as web and database hosting services.

S+N Customer. The Service may share the information it receives (including PHI) among users authorized to use the Service by an S+N Customer, including when the users are not directly employed by the S+N Customer. The Service may also share information (including PHI) among S+N Customers and their users who are providing or have provided care to a mutual patient and are using the Service to record the mutual patient’s episode of care information. The information is shared to improve patient continuity of care.

Service Users. We may share the information we receive with other users of the Service, such as S+N Customer users and the patients about which you submit information through the Service.

Legal and Similar Disclosures. We may access, preserve, and disclose your information, if we believe doing so is required or appropriate to: comply with law enforcement requests and legal process, such as a court order or subpoena; respond to your requests; comply with the law; or protect your, our, or others’ rights, property, or safety.

Merger, Sale, or Other Asset Transfers. If we are involved in a (proposed or actual) merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your information may be disclosed in connection with the negotiation of such transaction, and/or sold or transferred as part of such a transaction as permitted by law and/or contract.

With Your Permission. We may also disclose your information with your permission.

INFORMATION SECURITY

We take steps in an effort to treat your information securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us.

UPDATE YOUR INFORMATION OR POSE A QUESTION OR SUGGESTION

If you would like to request that we update or correct any information that you have provided to us through your use of the Service or otherwise, or if you have suggestions for improving this Privacy Policy, please send an email to privacyenquiries@smith-nephew.com.

CHANGES TO OUR PRIVACY POLICY AND PRACTICES

Posting of a Revised Privacy Policy. We may make changes to this Privacy Policy from time to time, and the revised version will be effective when it is posted. If we make any material changes, we will let you know through the Service, by email, or other communication. We encourage you to read this Privacy Policy periodically to stay up-to-date about our privacy practices. As long as you use the Service, you are agreeing to this Privacy Policy and any updates we make to it.

Contact Information

Smith & Nephew, Inc.
7135 Goodlett Farms Parkway
Cordova, TN 38016

Effective: 1 August 2021