

**Why do we provide you with this information?** We provide this information because we want you to clearly understand our policies, practices, and procedures for using, securing, and protecting the personal information in your PHR. The table below provides you a snapshot. Scroll through the entire document to get a more detailed view of our policies.

Who can view your personal information?	Credentials Required
<b>You</b>	Account Number and PIN
<b>Family and friends</b>	<ul style="list-style-type: none"> <li>● Account Number and PIN</li> <li>● Source of updated information will be listed as “Patient”</li> </ul>
<b>Healthcare providers without National Health Trust Credentials</b>	<ul style="list-style-type: none"> <li>● Account Number and PIN</li> <li>● Source of updated information will be listed as “Patient”</li> </ul>
<b>Healthcare providers with National Health Trust Credentials</b>	NHT membership credentials AND <ul style="list-style-type: none"> <li>● your account number, or</li> <li>● member search (at your option, this may require your PIN)</li> </ul>
<b>Insurers</b>	NOT ALLOWED
<b>Employers</b>	NOT ALLOWED
<b>Pharmacies</b>	NOT ALLOWED
<b>National Health Trust personnel</b>	YES, as required for administrative purposes
<b>Others</b>	NO, but you should understand that our security model, adapted from the financial industry, is designed to prevent others from access to your Personal Health Information. The model requires that your account number and PIN remain under your control. If others gain access to your account number and PIN, your information will be at risk.
<b>What can we use your personal information for?</b>	
<b>For National Health Trust’s quality control requirements</b>	YES
<b>For marketing to you</b>	YES
<b>For medical research</b>	YES
<b>For selling to others</b>	NO
<b>For legal reasons</b>	YES with valid court order
<b>For legally authorized Public Health Authorities</b>	YES
<b>What are our policies about closing your PHR?</b>	
<b>Can you close your PHR?</b>	YES
<b>Can you transfer your PHR?</b>	YES, prior to closing your account.

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

**What is personal information?**

You store personal information in your PHR as a way to help better manage your health. Personal information is information about you that includes contact information, demographic information, health information, and financial information. Examples are listed below:

**Contact Information** (e.g., for use in the event of an emergency or to speed up registering with a new physician)

- Name
- address
- email address
- Phone number
- Social security number
- Emergency contact

**Demographic Information** (e.g., to inform your physician of potential risk factors)

- Age
- Gender
- Ethnicity
- Occupation

**Health Information** (e.g., to better manage a health condition)

- Medical conditions
- Medications (over-the-counter and prescription)
- Lab/test results
- Doctor’s contact information
- Immunizations
- Disease management charts
- Injury management

**Financial Information** (e.g., to keep track of your health care expenses)

- Healthcare bills
- Health insurance
  - Healthcare savings account (HSA) information

**What PHR type are we?**

The National Health Trust is a health information exchange solution that allows you to store and retrieve your personal health information in a manner that benefits you. Knowing the PHR type we provide will help you understand our policies, practices, and procedures.

The National Health Trust is created by **Independent** providers of your Personal Health Record. This table provides an overview of the various PHR providers.

PHR provided by	Description
<b>Employer</b>	Some large employers offer PHRs as a feature of a benefits plan.
<b>Healthcare Provider</b>	Some healthcare providers offer PHRs as a way to provide patients with health information from the clinicians' record.
<b>Health Insurer (PPO or HMO)</b>	Some health insurers offer PHRs to provide consumers with information from health insurance claims.
<b>Independent</b>	Some independent internet companies offer PHRs directly to consumers. Some Employers, Healthcare Providers, and Health Insurers may also have partnerships with independent internet PHR companies.

---

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

**Who can view your personal information?**

When you set up your PHR, you may be able to give permission to certain people or groups to view some or all of your personal information.

	<b>Can they view information?</b>	<b>Can they add information?</b>	<b>Can they edit information?</b>
<b>You (PHR customer)</b>	YES	YES	YES
<b>Your family and friends</b>	YES, if given your account credentials	YES, if given your account credentials	YES, if given your account credentials
<b>Your healthcare providers who have valid credentials with the National Health Trust</b>	YES, when they provide your account number, or perform a member search (at your option, this may require your PIN)	YES, when they provide your account number, or perform a member search (at your option, this may require your PIN)	YES, when they provide your account number, or perform a member search (at your option, this may require your PIN)
<b>Your healthcare providers who do not have valid credentials with the National Health Trust</b>	YES, if given your account credentials (only account number is required for emergency access)	YES, if given your account credentials. Source of updated information will be listed as "Patient"	YES, if given your account credentials. Source of updated information will be listed as "Patient"
<b>Your health insurer</b>	NO	NO	NO
<b>Your employer</b>	NO	NO	NO
<b>Your pharmacy</b>	NO	NO	NO
<b>The National Health Trust and its employees</b>	YES <ul style="list-style-type: none"> <li>• for administrative purposes only</li> <li>• subject to privacy policy and Terms of Use</li> </ul>	NO	NO

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

	Can they view information?	Can they add information?	Can they edit information?
<b>Companies doing work for The National Health Trust to operate and manage the systems</b>	YES <ul style="list-style-type: none"> <li>• for administrative purposes only</li> <li>• subject to privacy policy and Terms of Use</li> </ul>	NO	NO
<b>The National Health Trust's business and advertising partners</b>	NO	NO	NO
<b>Law enforcement for legal investigations</b>	YES, with valid court order	NO	NO
<b>Government for national security</b>	YES, with valid court order	NO	NO
<b>The public (through chat rooms and forums)</b>	NO	NO	NO

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

**How may we use your personal information?**

<b>Common uses of personal information in a PHR</b>	<b>Does The National Health Trust do this?</b>	<b>Can you opt out?</b>
For you and your health needs	YES	YES
Process exchanges between your PHR and healthcare providers	YES	YES
Process exchanges between your PHR and labs, pharmacists, health plans, etc.	YES	YES
The National Health Trust's everyday business practices	NO	YES
Communicate with you	YES	YES
Maintain and improve The National Health Trust's PHR systems	YES	YES
Manage The National Health Trust's security systems (such as against spam, misuse, and criminal activity)	YES	NO
The National Health Trust's marketing purposes – to offer our health-related products and services to you	YES	NO

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

Common uses of personal information in a PHR (continued)	Does The National Health Trust do this?	Can you opt out?
The National Health Trust's marketing purposes – to offer our non-health-related products and services to you	NO	NO
Sharing and selling for marketing: Your personal information to our business and advertising partners	NO	NO
Sharing and selling for marketing: Anonymized information to our business and advertising partners	NO	NO
Sharing and selling for marketing: Anonymized information for The National Health Trust to market itself to business partners	YES	NO
Sharing and selling for medical research	YES	NO
Your <u>personal information</u> for medical and public health research	YES	NO
<u>Anonymized information</u> for medical and public health research	YES	NO
For legal reasons, comply with subpoenas, court orders, and search warrants	YES	YES

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

**What are our policies about closing your PHR?**

The National Health Trust has specific policies if you close your PHR.

<b>Common closing questions</b>	<b>Your options</b>
<b>Can you close your PHR?</b>	YES
<b>Is your personal information permanently removed from The National Health Trust's systems?</b>	YES, after a one year grace period.
<b>How long does The National Health Trust keep your personal information?</b>	One year after subscription expiration (not guaranteed)
<b>Will all authorized users' access be immediately terminated?</b>	NO
<b>Can you transfer your PHR data to another PHR?</b>	YES, prior to closing PHR

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

<b>Reasons you may be Notified</b>	<b>Will The National Health Trust Notify you?</b>	<b>Can you opt out?</b>	<b>Your options once Notified</b>
<b>Changes to The National Health Trust's policies, practices, and procedures</b>	YES, on web site or via email	NO	Maintain or close account
<b>If The National Health Trust is sold, merges with another company, or goes out of business.</b>	YES, on web site or via email	NO	Maintain or close account
<b>In the event of a security breach</b>	YES, on web site or via email	NO	Maintain or close account
<b>Changes to PHR services, such as new features</b>	YES, on web site or via email	NO	Maintain or close account
<b>Changes to the type of information available to or through your PHR</b>	YES, on web site or via email	NO	Maintain or close account
<b>Newsletters and optional surveys</b>	YES	NO	Maintain or close account
<b>Marketing materials from The National Health Trust and associates</b>	YES	NO	Maintain or close account

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.

**How do we store and protect your personal information?**

The National Health Trust uses physical, technical, and procedural safeguards to protect your personal information from unauthorized access or use.

<b>Common protections of online and health information</b>	<b>Does The National Health Trust do this?</b>
<b>Legal protections: subject to and remains compliant with all relevant laws and regulations.</b>	YES
<b><u>HIPAA Privacy and Security Rules for health information</u></b>	YES
<b><u>Computer network and data processing protections</u></b>	YES
<b>Log of all PHR views (audit trail)</b>	YES
<b><u>All data processed in USA</u></b>	YES
<b><u>User ID and password</u></b>	YES
<b><u>Time-out your PHR access when your computer is idle</u></b>	YES
<b>Data storage protections</b>	YES
<b>All data storage in USA</b>	YES
<b>Geographically diverse data storage locations</b>	YES
<b>Data storage power supply redundancy, environmental controls, and a security system</b>	YES

**Contact Information**

Web: [www.NationalMedicalNetwork.com](http://www.NationalMedicalNetwork.com)

Email: [info@healthcapable.com](mailto:info@healthcapable.com)

Privacy Officer: Dr. Thomas Zhang

Write: 233 E. Erie, 2406, Chicago, IL 60611

Call: 800 893 3051

**THE NATIONAL HEALTH TRUST IS MANAGED BY HEALTHCAPABLE, INC.**

We reserve the right to change our privacy policy with 60 days notice, posted on our web site. This will allow you to edit your personal health information or close your account prior to the changes taking place.