

Patient Portal Privacy Policy

Last updated: May 26, 2026

This Privacy Policy describes how Etactics, Inc. ("Etactics," "we," "us") collects, uses, shares, and protects information within the Customer Access Plus patient portal ("Portal") and the associated SMS notification program. This Privacy Policy applies solely to the Portal and the SMS notification program. It does not apply to the etactics.com marketing website, which is governed by a separate Privacy Policy available at etactics.com/privacy.

1. Our Role

Etactics provides the Portal under contract with provider organizations ("Providers"). When you use the Portal, you are accessing services that your Provider has engaged Etactics to deliver on its behalf. Etactics acts as a service provider and, where applicable, as a business associate to your Provider under the Health Insurance Portability and Accountability Act (HIPAA).

For privacy practices specific to your healthcare information held by your Provider, please refer to your Provider's Notice of Privacy Practices.

2. Information We Collect

Through your use of the Portal, Etactics may collect or receive the following categories of information:

- Account information provided by your Provider, including your name, account number, and billing details.
- Contact information you provide or update within the Portal, including email address and mobile phone number.
- Notification preferences you set within the Portal, including whether you have opted in to SMS notifications and any associated consent records (timestamp, IP address).
- Authentication information used to verify your identity and secure your account.
- Payment information you submit through the Portal, which is processed by our payment processor in accordance with applicable card industry security standards (PCI-DSS).
- Usage information such as log records, IP address, and device or browser type, used to operate the Portal securely.

3. How We Use Information

Information collected through the Portal is used only for the following purposes:

- To provide Portal services to you on behalf of your Provider, including displaying account and billing information.
- To deliver notifications you have requested or consented to, including email and SMS notifications.
- To process payments you initiate.
- To authenticate users, maintain security, and prevent fraud.
- To comply with legal obligations and respond to lawful requests.
- To respond to your support requests.

4. SMS Notification Program

If you opt in to SMS notifications within the Portal, the following terms apply to your mobile phone number and related consent data.

Etactics does not sell, share, rent, lease, or otherwise transfer mobile phone numbers, SMS opt-in data, consent records, or any other information collected in connection with the SMS notification program to any third party for marketing, advertising, or promotional purposes. This restriction applies to all third parties, including affiliates, business partners, advertising networks, data brokers, and analytics providers.

Mobile information collected for the SMS notification program is used solely to:

- Deliver the SMS messages you have consented to receive.
- Route messages through telecommunications service providers (such as Twilio and wireless carriers) strictly for the technical purpose of message delivery.
- Maintain records of consent, opt-out requests, and message delivery as required by law and industry regulation.
- Provide support related to the SMS notification program.

Message frequency varies based on account activity but typically does not exceed 3 messages per month.

Message and data rates may apply depending on your mobile carrier and plan. Etactics does not charge you for SMS messages, but your wireless carrier may assess charges.

For help, reply HELP to any SMS message from the program or contact Etactics using the information in the Contact Us section below.

Telecommunications service providers and wireless carriers that handle SMS messages on Etactics' behalf act as message delivery vendors. They are contractually prohibited from using your mobile information for any purpose other than message delivery.

SMS messages sent through the program contain notification information only (for example, "a new statement is ready"). Protected health information is not transmitted within SMS message content. To view account or billing details, you must log in to the secure Portal.

You may opt out of the SMS notification program at any time by:

- Replying STOP to any SMS message received from the program, or
- Updating your notification preferences within the Portal.

For complete details about the SMS notification program, including opt-in, opt-out, HELP, message frequency, and message/data rate disclosures, see the Customer Access Plus Terms and Conditions at <https://etactics.com/sms-consent-terms-conditions>.

5. How We Share Information

Etactics shares Portal information only as follows:

- With your Provider, who originated your account relationship.
- With service providers acting on Etactics' behalf under contractual confidentiality and data protection obligations. These include hosting and infrastructure providers, payment processors, and telecommunications providers. Service providers are permitted to use information only as necessary to perform services for Etactics.
- As required by law, including in response to subpoenas, court orders, or other legal process, or to comply with regulatory obligations.
- To protect rights and safety, where Etactics reasonably believes disclosure is necessary to investigate, prevent, or respond to suspected fraud, security incidents, or violations of applicable terms or law.

Etactics does not sell Portal information. Etactics does not share Portal information with third parties for marketing or advertising purposes under any circumstances.

6. No Advertising or Marketing Tracking Within the Portal

The Portal does not use third-party advertising cookies, advertising networks, or marketing analytics tools that share information with external advertisers. Information collected through the Portal is not used to target advertising to you on any platform.

7. Data Security

Etactics maintains administrative, technical, and physical safeguards designed to protect Portal information against unauthorized access, disclosure, alteration, or destruction. Safeguards include encryption of data in transit and at rest, access controls, authentication requirements, and audit logging, consistent with applicable HIPAA Security Rule requirements.

No method of transmission or storage is completely secure. While Etactics works to protect your information, we cannot guarantee absolute security.

8. Data Retention

Etactics retains Portal information for as long as reasonably necessary to provide services and to comply with legal, regulatory, and contractual obligations, including record retention requirements applicable to healthcare data and SMS consent records. Retention periods may vary by data category and by the requirements of your Provider.

9. Your Choices and Rights

- Notification preferences: You may update your email and SMS notification preferences at any time within the Portal.
- SMS opt-out: You may opt out of SMS at any time by replying STOP or updating Portal preferences.
- Access and correction: Requests to access or correct information held in your Portal account should be directed to your Provider, who controls the underlying account record.
- Other rights: Depending on your state of residence, you may have additional rights under applicable privacy laws. Contact information for exercising these rights is in Section 12.

10. Children

The Portal is not directed to children under 13. Etactics does not knowingly collect personal information from children under 13 through the Portal. Where a Provider account is established for a minor patient, account access and notification preferences are managed by the patient's parent or legal guardian in accordance with the Provider's policies.

11. Changes to This Privacy Policy

Etactics may update this Privacy Policy from time to time. When changes are made, Etactics will update the "Last updated" date at the top of this policy. Material changes will be communicated through the Portal or by other reasonable means.

12. Contact Us

Questions about this Privacy Policy, or requests to exercise privacy rights, may be directed to:

Etactics, Inc. Attn: Privacy 300 Executive Pkwy W Hudson, OH 44236

Email: privacy@etactics.com