

Privacy Policy

Effective Date: July 6, 2025

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At Ararat Psychiatry LLC ("Ararat Psychiatry LLC," "we," "our," or "us"), your privacy is our top priority. We are committed to safeguarding your personal information with the highest standards of confidentiality and care. This Privacy Policy describes how we collect, use, disclose, and protect your information when you receive care through our secure telehealth platform and interact with our website, mobile applications, or any other services that link to this Privacy Policy (collectively, the "Services").

This policy is designed to help individuals who use our services ("you," "your," or "Users") understand how we handle your personal and health-related information. This includes users who create an account to receive care, as well as individuals who visit our website or access certain features without registering (referred to as "Visitors"). Please note that certain functions, such as booking an appointment, accessing treatment plans, or communicating with your provider, are available only to registered users with an active patient account.

By using or accessing our services in any capacity, you acknowledge that you have read and understood this Privacy Policy and agree to the collection, use, and disclosure of your information as described herein. If you do not agree with the terms of this Privacy Policy, you should not use our services. If you are utilizing the services on behalf of another individual, such as a minor or someone under your legal care, you confirm that you are authorized to accept this Privacy Policy on their behalf.

This policy applies to:

- **Patients/Users** who create an account and receive services; and
- **Visitors** who browse our website without registering.

By using our services in any capacity, you acknowledge you have read and understood this document.

1. Our Commitment to Your Privacy

At Ararat Psychiatry LLC, we are fully committed to protecting your privacy and maintaining the confidentiality of your personal and health information. We strictly adhere to all applicable federal and state privacy regulations, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA), which sets the national standard for the protection of sensitive patient health information.

Some demographic, medical, and health-related information that Ararat Psychiatry LLC collects as part of delivering our telehealth services may be classified as Protected

Health Information (“PHI”) under the Health Insurance Portability and Accountability Act (“HIPAA”). This applies when:

Ararat Psychiatry LLC provides clinical or administrative services to a healthcare professional or provider who is considered a Covered Entity under HIPAA.

In doing so, Ararat Psychiatry LLC receives identifiable patient information on behalf of that provider; and information qualifies as PHI and is protected under HIPAA regulations. In such cases, Ararat Psychiatry LLC may serve in the role of a Business Associate and is required to comply with all HIPAA rules regarding the privacy, security, and permissible use of PHI. These specific protections and limitations are outlined in the Notice of Privacy Practices provided by your healthcare provider.

It’s important to understand that this Privacy Policy does not govern PHI, as HIPAA regulations take precedence in those cases. Instead, HIPAA establishes how PHI must be protected and how it may be used or disclosed.

However, not all information you provide to Ararat Psychiatry LLC is considered PHI. For example, personal information collected when you:

- Create a patient account
- Search for services
- Navigate our website
- Submit reviews or feedback

Sharing technical information such as IP address or browser data is typically considered Personally Identifiable Information (“PII”), not PHI. In these situations, when we are not acting as a Business Associate, this Privacy Policy governs how that data is collected, used, and protected.

If you authorize your healthcare provider to share your PHI with Ararat Psychiatry LLC outside the context of a HIPAA-regulated service (such as through a HIPAA authorization or patient access request), that information may also be governed by this Privacy Policy, depending on the context of use.

PART A- Notice of Privacy Practices (HIPAA)

I. Uses and Disclosures of PHI

A. Uses and Disclosures for Treatment, Payment, and Healthcare Operations

We may use and disclose your PHI for the following purposes:

1. Treatment

We may use and disclose your PHI to provide, coordinate, or manage your healthcare and related services. This includes sharing information with other providers (such as specialists, laboratories, pharmacies, or facilities) involved in your care when appropriate.

2. Payment

We may use and disclose your PHI to obtain payment for services. This may include verifying insurance coverage, determining eligibility, reviewing medical necessity, obtaining authorizations, and processing claims.

3. Healthcare Operations

We may use and disclose PHI to support our operations, such as quality improvement, training, licensing, compliance, auditing, and business administration. We may also contact you to remind you of appointments or provide information related to your care.

Business Associates: We may share PHI with third parties that perform services on our behalf (e.g., billing services, EHR vendors, telehealth platforms). When required, we maintain written agreements to protect the privacy of your PHI.

Health-Related Communications: We may contact you about treatment alternatives or other health-related benefits and services. If communications are considered marketing under HIPAA, we will obtain authorization when required by law.

B. Other Uses and Disclosures with Your Written Authorization

Uses and disclosures of PHI for purposes other than treatment, payment, and healthcare operations will be made only with your **written authorization**, unless otherwise permitted or required by law. You may revoke an authorization in writing at any time, except to the extent we have already acted in reliance on it.

C. Disclosures with Opportunity to Agree or Object

Unless you object, we may disclose PHI to a family member, relative, close friend, or another person you identify, to the extent relevant to their involvement in your care or payment for care. If you are not present or unable to agree or object, we may use professional judgment to determine whether disclosure is in your best interest.

We may also disclose PHI to authorized public or private entities for disaster relief purposes to coordinate notifications and communications.

D. Disclosures Without Your Consent or Authorization (Permitted or Required by Law)

We may use or disclose your PHI without your consent or authorization in certain situations, including:

1. As Required by Law (including mandatory reporting)
2. Public Health Activities (to control disease, injury, or disability)
3. Health Oversight Activities (audits, investigations, inspections)
4. Abuse, Neglect, or Domestic Violence (as permitted/required by law)
5. FDA and Product Safety Activities
6. Judicial and Administrative Proceedings (court orders, subpoenas, lawful process)
7. Law Enforcement Purposes (as permitted by law)
8. Serious Threat to Health or Safety (to prevent or lessen a serious and imminent threat)
9. Workers' Compensation
10. Inmates/Correctional Institutions (as permitted by law)
11. Required Disclosures to you or to HHS for HIPAA compliance investigations

II. Your Rights Under HIPAA

You have the following rights regarding your PHI:

A. Right to Inspect and Copy

You may request access to inspect and obtain a copy of your PHI in a designated record set, as allowed by law. In limited cases, access may be denied (e.g., certain legal proceedings). You may have the right to request a review of some denials.

B. Right to Request Restrictions

You may request restrictions on certain uses or disclosures of your PHI for treatment, payment, or healthcare operations. We are not required to agree to all requested restrictions. If we agree, we will follow the restriction unless emergency treatment is needed.

C. Right to Request Confidential Communications

You may request that we communicate with you by alternative means or at an alternative location. We will accommodate reasonable requests. We will not require you to explain the reason for your request.

D. Right to Request Amendments

You may request an amendment to your PHI if you believe it is inaccurate or incomplete. If we deny the request, you may submit a written statement of disagreement, and we may prepare a rebuttal.

E. Right to an Accounting of Disclosures

You have the right to receive an accounting of certain disclosures of your PHI made for purposes other than treatment, payment, or healthcare operations, as described in this Notice. This accounting excludes disclosures made to you, to authorized family members or friends involved in your care, or for notification purposes.

F. Right to a Paper Copy

You have the right to obtain a paper copy of this Notice upon request, even if you previously agreed to receive it electronically.

PART B- PRIVACY POLICY (WEBSITE / ONLINE SERVICES)

1. Information We Collect (Non-PHI and Service Data)

We collect information necessary to provide psychiatric care and comply with healthcare regulations. This may include:

- Personal identification (name, date of birth, contact information)
- Insurance and billing information
- Medical history and mental health records
- Appointment history and treatment plans
- Communication through the patient portal or telehealth sessions
- Technical Information, such as IP address, browser type, operating system, and usage data for our website or telehealth platform.

How We Use Your Information

We use your information to:

- Provide psychiatric evaluation, diagnosis, treatment, and follow-up care
- Schedule and manage your telehealth appointments
- Submit claims to your insurance provider
- Communicate with you regarding your care
- Fulfill legal and regulatory obligations
- Improve the quality of our services.

We may also receive information from your insurance provider or other health professionals involved in your care (with your consent).

2. How We Share Your Information/Service Information

A. With Your Consent:

- Coordinating care with other healthcare providers or specialists
- Communicating with family members or caregivers (if authorized)

B. Without Your Consent (as permitted by law):

- For billing and insurance purposes
- For audits or licensing compliance
- If required by law, such as a subpoena or mandated reporting
- In case of imminent risk to yourself or others

C. With Trusted Third-Party Vendors:

We partner with HIPAA-compliant service providers, including:

- Telehealth platforms
- Electronic Health Record (EHR) providers
- Secure messaging platforms
- Cloud storage and backup services

3. Telehealth Security and Confidentiality

All services are delivered via a secure, encrypted, HIPAA-compliant telehealth platform. We take every precaution to protect the privacy of your sessions, including:

- Secure video conferencing software
- Encrypted electronic health records (EHR)
- Verified patient identity before sessions
- Private, confidential communication between you and your provider.

4. Telehealth Considerations (Patient Responsibilities)

- All services at Ararat Psychiatry are delivered via telehealth. While we take every precaution to secure your virtual sessions, we encourage you to:
- Join your appointment from a private and quiet location
- Use secure internet connections (avoid public Wi-Fi)
- Keep your login information confidential.

5. Children’s Privacy

The services offered by Ararat Psychiatry LLC are intended for use only by individuals who are 18 years of age or older. Following the Children’s Online Privacy Protection Act (COPPA) and the Health Insurance Portability and Accountability Act (HIPAA), we do not knowingly collect, use, or disclose personally identifiable health information from anyone under the age of 18 without verified consent from a parent or legal guardian.

If you are under 18 years old, you are not authorized to create an account, schedule appointments, or submit any personal or health information through our services. By accessing and using our telehealth platform, including submitting health-related data, you represent and warrant that you are at least 18 years of age.

If we become aware that personal health information (“PHI”) or personally identifiable information (“PII”) has been submitted to us by a child under the age of 13 without verified parental consent, we will take immediate action. This includes using the information only to notify the minor (or their parent or guardian) that they are not eligible to use the services and proceeding to delete the data in compliance with applicable federal and state laws, including HIPAA and COPPA.

If you believe that a child under the age of 18 has submitted personal or health-related information to Ararat Psychiatry LLC in error, be sure to get in touch with us immediately at info@araratpsych.com so we can take prompt, appropriate action following applicable law.

Parental or Guardian Use of Services on Behalf of a Minor:

Minors between the ages of 13 and 18 may only access the services under the direct supervision or with the consent of a parent or legal guardian. In such cases, the parent or guardian may engage with the services on the minor’s behalf, and all data shared will be treated as Protected Health Information (PHI) under HIPAA and handled accordingly.

Any access or use by a parent or guardian on behalf of a minor is also subject to the Terms of Use and Privacy Policy of Ararat Psychiatry LLC. By using the services in this capacity, you affirm that you have legal authority to act on behalf of the minor and to consent to the use and disclosure of their health information as described in our policies.

Use on Behalf of Another Individual:

If you are accessing the services on behalf of another person, whether a minor, dependent adult, or other individual under your legal care, you agree and acknowledge that:

- Ararat Psychiatry LLC may contact you regarding matters related to the provision of care, including communications required by law or regulation; and
- You are responsible for conveying all relevant information to the individual for whom you are acting.

You further agree that any data submitted through the services on behalf of another person will be treated as PHI under HIPAA and protected following applicable laws and our Notice of Privacy Practices.

6. Data Retention

At Ararat Psychiatry LLC, we retain patient records following all applicable federal and state laws. Your personal information is maintained only for as long as necessary to provide our services or to support legitimate business interests related to its collection and use. When deciding the appropriate retention period for different categories of personal data, we consider factors including the origin of the data, the purpose of collection, the ongoing need to retain it, and the sensitivity of the information.

In certain situations, we may keep personal data for a longer duration to satisfy legal obligations, resolve disputes, collect outstanding payments, continue service delivery, or comply with regulatory requirements and industry standards. We may also retain data in a de-identified or aggregated form that cannot be linked back to you personally. Such information may be used for purposes like analysis, quality improvement, and business insights.

7. Data Storage & Security

We employ industry-standard safeguards to protect your information, including:

- End-to-end encryption for all telehealth sessions
- Secure servers and encrypted databases
- Role-based access control (only authorized staff may view your records)
- Two-factor authentication for provider logins
- Routine audits and vulnerability assessments

At Ararat Psychiatry LLC, safeguarding your personal information is a priority. We implement a range of physical, technical, organizational, and administrative safeguards designed to protect your data from unauthorized access, misuse, or disclosure. The level and type of protections we apply depend on the sensitivity of the information and how it is processed.

For instance, our services employ industry-recognized encryption protocols, such as Secure Sockets Layer (SSL) technology, to secure your data during transmission. Your information is stored and managed on servers located both within the United States and internationally. We also maintain robust backup and archival systems in line with

accepted industry practices to ensure data integrity and availability. While we commit to maintaining a secure environment, you play an important role in protecting your information. This includes choosing strong passwords or other authentication methods, limiting access to your devices and browsers, and logging out after using your account.

Despite these efforts, please understand that no system of data transmission or storage can be guaranteed to be completely secure. Although we make reasonable and good-faith efforts to protect your data within secure environments not accessible to the public, Ararat Psychiatry LLC cannot guarantee absolute security. Except where mandated by law, we are not liable for any unauthorized access, theft, loss, or accidental disclosure of your information.

8. Cookies and Website Analytics (if applicable)

Ararat Psychiatry LLC uses cookies and comparable technologies, such as pixel tags, web beacons, and mobile device identifiers, to recognize your device and browser when you visit or use our services. These tools help us analyze usage patterns, improve functionality, personalize your experience, and deliver relevant advertising both on and off our platforms.

What Are Cookies?

Cookies are small data files placed on your device when you access our services. We may also receive information from third parties who place their cookies on your device.

Types of Cookies We Use:

- **Essential Cookies:** Required for core functions, like logging into secure areas. Disabling these may affect your ability to use some features.
- **Functional Cookies:** Remember your preferences and settings to customize your experience, such as language or region.
- **Performance/Analytical Cookies:** Collect data about how you interact with our services, pages visited, time spent, clicks, etc., helping us improve performance and measure advertising impact. For example, we use services like Google Analytics, which you can opt out of through Google's tools.
- **Advertising/Retargeting Cookies:** Track your online activity to serve ads tailored to your interests across various sites.
- **Web Beacons:** Tiny graphic files embedded in emails or web pages that help us understand usage and effectiveness of communications and advertising.
- **Mobile Device Identifiers:** Collect information about your mobile device and usage patterns to better understand demographics and behavior.
- **Cross-Device Matching:** Work with partners to analyze user interactions across multiple devices to improve service and advertising relevance.

Managing Cookies and Preferences:

You can opt out of non-essential cookies at any time through your browser settings or by using the opt-out links provided. Most browsers allow you to block or delete cookies, but doing so may limit some functionality and require you to reset preferences frequently. You can also manage mobile device identifiers through your device settings.

For detailed information on cookies and how to manage them, please refer to your browser's help or preferences section.

“Do Not Track” Signals:

Currently, Ararat Psychiatry LLC does not respond to browser “Do Not Track” signals. However, if you reside in a jurisdiction with applicable privacy laws, we will respect opt-out preferences related to the sale or sharing of personal data and targeted advertising as required by law.

9. Changes to This Policy

At Ararat Psychiatry LLC, we reserve the right to revise or update this Privacy Policy at any time, at our sole discretion, in response to changes in our operations, applicable laws, or advances in technology.

When changes are made, we will update the “Last Updated” date at the top of this policy to reflect the most recent version. If we implement any material changes that significantly affect how we collect, use, or protect your personal information, we will notify you through a prominent notice on our website or by direct communication, such as email, when appropriate.

Please be aware that your continued use of our services following any update constitutes your acceptance of the revised Privacy Policy. The handling of your information will be governed by the version in effect at the time it was collected.

We encourage all users to review this Privacy Policy periodically to stay informed about how Ararat Psychiatry LLC safeguards your privacy.

10. Contact Us

If you have any questions about this Privacy Policy or your privacy rights, please contact:

Ararat Psychiatry LLC

Email: info@aratatpsych.com

Phone: 305-615-5145

Website: www.araratpsychiatry.com