

## B. NOTICE OF PRIVACY PRACTICES

Thomas Allen provides all persons a Notice of Privacy Practice. This Notice provides information regarding the uses and disclosures of protected health information that may be made by Thomas Allen, person's rights as they pertain to protected health information, and Thomas Allen's legal duties with respect to protected health information and person's rights.

Thomas Allen's Notice of Privacy Practice complies with the requirements as noted in the Federal Health Insurance Portability and Accountability Act, Standard for Privacy of Individually Identifiable Health Information. Thomas Allen's notice is titled Notice of Privacy Practices.

Thomas Allen's website addresses are:

<http://www.thomasalleninc.com>  
<https://learn.thomasalleninc.com>  
<https://courses.thomasalleninc.com>

Thomas Allen, located in Dakota County, at 1550 Humboldt Ave West St Paul, MN 55118, owns and operates these websites.

1. Provision of Notice of Privacy Practices to Persons
  - a. Thomas Allen provides the Notice of Privacy Practices to the person or the person's legal representative no later than the date of the first delivery of services. A good faith effort is made to obtain a written acknowledgment of receipt of the Notice of Privacy Practice provided to the person or the person's legal representative. This written acknowledgment is documented on the last page of the Notice of Privacy Practices through a signature and date. The original notice is placed in the person's file and a copy provided to the person or their legal representative.
  - b. In an emergency treatment situation, Thomas Allen shall provide the Notice of Privacy Practice and obtain written acknowledgement of receipt of the Notice as soon as reasonably practicable after the emergency treatment situation is addressed. The delay in the provision of the Notice is to be documented and the documentation placed in the person's file.
  - c. If Thomas Allen is unable to obtain a written acknowledgment, it shall document its good faith efforts to obtain the acknowledgment and the reason why the acknowledgment was not obtained. This information is documented on the Notice of Privacy Practices and placed in the person's file. This would include situations where the person refuses to sign the notice or return a signed notice.

- d. The Notice of Privacy Practices and any documentation pertaining to the same is retained in the person's permanent file for the duration of service delivery.
4. Posting and Availability of Notice of Privacy Practices
- a. Thomas Allen has copies of the Notice of Privacy Practice available at its service delivery site(s) and at the Corporate Office for persons and/or their legal representatives.
  - b. Thomas Allen makes the Notice of Privacy Practice available electronically through the website, on the Services page.
  - c. Thomas Allen may provide the Notice of Privacy Practice to a person or the person's legal representative by e-mail, if the person or the person's legal representative agrees to receive electronic notice and such agreement has not been withdrawn. If Thomas Allen knows that the e-mail transmission has failed, a paper copy will be provided to the person or the person's legal representative. A person or the person's legal representative who receives an electronic Notice of Privacy Practice retains the right to obtain a paper copy of the Notice of Privacy Practice from Thomas Allen upon request.
5. Revision to the Notice of Privacy Practices
- a. Thomas Allen shall promptly revise and distribute its Notice of Privacy Practice whenever there is a material change to the uses or disclosures, person rights, Thomas Allen legal duties, or other privacy practices stated in the Notice of Privacy Practice.
  - b. Except when required by law, a material change to any term of the Notice of Privacy Practice may not be implemented prior to the effective date of the revised Notice of Privacy Practice in which such material change is reflected.
  - c. Whenever the Notice of Privacy Practice is revised, Thomas Allen:
    - 1) Makes the Notice of Privacy Practice available upon request by the effective date of the revision;
    - 2) Has the Notice of Privacy Practice available at the service delivery site for persons or their legal representatives to request to take with them;
    - 3) Posts the revised Notice of Privacy Practice on the Services page of its website. Thomas Allen encourages visitors to frequently check this page for any changes. Your continued use of this site after any change in this privacy policy will constitute your acceptance of this change.
    - 4) Provides person or the person's legal representative with a revised Notice of Privacy Practice if the revision is effective for protected health

information that Thomas Allen created or received prior to revising its Notice of Privacy Practices; and

- 5) Thomas Allen retains this information for at least six (6) years from the date when the information was last in effect.
6. Minnesota Notice of Access to Health Records and Rights (Minnesota Health Care Records and Data Practices ACT)
  - a. Thomas Allen provides a copy of its policy titled Tennessee Warning/Data Privacy to every person or their legal representative upon service initiation.
  - b. Thomas Allen shall make a reference to the Minnesota Notice in the Notice of Privacy Practices required by HIPAA to ensure that persons and their legal representatives understand the additional uses and disclosures of Protected Health Information permitted by state laws.
7. It is Thomas Allen's policy to respect your privacy regarding any information Thomas Allen may collect while operating our website.
  - a. Thomas Allen collects non-personally-identifying information as typically available through browsers and servers, such as browser type, language preference, referring site, and the date and time of each visitor request. Thomas Allen's purpose in collecting this information is to better understand how visitors use our website and who comprises our audience for improved and targeted content creation. Thomas Allen may use this information periodically to collect non-personally identifying information to compile analytics reports on trends in the usage of the website.
  - b. Thomas Allen also collects potentially personally-identifying information like Internet Protocol (IP) addresses for logged in users and those leaving comments on [www.thomasalleninc.com](http://www.thomasalleninc.com), <https://learn.thomasalleninc.com>; or <https://courses.thomasalleninc.com> or other interactive forms that may be used, such as on the Careers page. Thomas Allen only discloses logged-in user and commenter IP addresses under the same circumstances that it uses and discloses personally identifying information as described below, except that commenter IP addresses and email addresses are visible and disclosed to the administrators of the site where the comment was left.
  - c. Certain visitors to Thomas Allen's website choose to interact with Thomas Allen in ways that require Thomas Allen to gather personally-identifying information. The amount and type of information that is gathered depends on the nature of the interaction. For example, we ask visitors who sign up at <https://learn.thomasalleninc.com>; or <https://courses.thomasalleninc.com> to provide a user name and email address. Those who engage in transactions with Thomas Allen are asked to provide additional information, including as necessary the personal and financial information required to process those transactions; only the information that is necessary or appropriate to fulfill the

purpose of the visitor's interaction is collected. Thomas Allen does not disclose personally-identifying information other than as described below. Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.

- d. Thomas Allen may collect statistics about visitors to its website. Thomas Allen may provide it to others. However, Thomas Allen does not disclose personally-identifying information other than as described below.
- e. Thomas Allen discloses personally-identifying information only to those of its employees, contractors, and affiliated organizations that
  - a. need to know that information in order to process it on Thomas Allen's behalf or to provide services available at our website, and
  - b. that have agreed not to disclose it to others. Some of its employees, contractors, and affiliated organizations may be located outside of your home country; you consent to the transfer of such information to them by using Thomas Allen's website.
- f. Thomas Allen will not rent or sell potentially personally-identifying or personally-identifying information to anyone. Other than its employees, contractors and affiliate organizations, as described above, Thomas Allen discloses such information only in response to a subpoena, court order or other governmental request, or when Thomas Allen believes in good faith that disclosure is reasonably necessary to protect the property or rights of Thomas Allen third parties or the public at large.
- g. If you are a registered user of Thomas Allen's website and have supplied your email address, Thomas Allen may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Thomas Allen and our services. If you send us a request (for example via email or one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users.
- h. Thomas Allen takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.
- i. Thomas Allen uses cookies (a string of information stored on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns) to help identify and track visitors, their usage of our website, and their website access preferences. Visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Thomas Allen website; a drawback is that certain features of the Thomas Allen website may not function properly without the aid of cookies.

- j. If Thomas Allen, or substantially all of its assets, were acquired, or in the unlikely event that Thomas Allen goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Thomas Allen may continue to use your personal information as set forth in this policy.
  - k. Thomas Allen uses a Facebook Pixel, which is a piece of code obtained through Facebook and installed on our website, to track visitors use of our websites and our Facebook business pages, This information is used by Thomas Allen to deliver more targeted ads for our audience and audience look-a-like, enabling us to deliver ads to those persons most likely to be interested in the advertisement. Thomas Allen also uses Google Analytics to provide analytical information regarding traffic to our websites, and the source of that traffic. These analytics are made possible by use of cookies by Google.
8. What personal data is collected through the use of our website(s) and why we collect it:
- a. Comments: when visitors leave comments on the site we collect the data shown in the comments form. We also collect the visitor’s IP address and browser user agent string to help spam detection.
  - b. An anonymized string created from a user’s email address (also called hash) may be provided to the Gravatar service. The Gravatar service privacy policy is available at <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

9. Cookies

For convenience purposes, comments left on any Thomas Allen website provide an option for the commenter to save their name, email address, and website in cookies. If selected, these cookies will save for one year.

When users log into an account, a temporary cookie will be set up to determine if the user’s browser accepts cookies. This temporary cookie contains no personal data and is discarded when the user closes the browser.

When a user logs in, several cookies will be set up to save their log in information and screen display choices. Login cookies last for two days, and screen option cookies last for one year. If the user selects “Remember Me” their log in will persist for two weeks. Cookies will be removed once the user logs out.

10. Content Embedded from Other Websites

Articles on a Thomas Allen website may be embedded content (videos, images, articles, etc.). Embedded content behaves in the exact same way as if the visitor has visited other websites. Websites may collect data about users, use cookies,

embed additional third-party tracking, and monitor users interaction with that embedded content.

11. Analytics

- a. Data Sharing: Persons served, their legal representatives, family members, employees, and community partners may opt-in to receiving agency information and offerings via email. Thomas Allen uses Mailerlite to collect subscriber name, email address, and date(s) of subscription to Thomas Allen's email list. Mailerlite's privacy policy can be found at <https://www.mailerlite.com/legal>
- b. If a user leaves a comment, the comment and it's metadata are retained indefinitely. This is so Thomas Allen can recognize and approve any follow up comments automatically instead of holding them in a moderation queue. If users register on any Thomas Allen website, their personal information (provided in their user profile) is stored. With the exception of their username, all users can see, edit or delete their personal information at any time.

12. If they have an account on any Thomas Allen website, or have left comments, users have the right to request that Thomas Allen erase any personal data on file. This does not include data that Thomas Allen is obligated to retain for administrative, legal, or security purposes.

13. Visitor comments may be checked through an automated spam detection service. Thomas Allen uses services provided through Securrence. Their contact information: 1.866.200.9013 [info@securrence.com](mailto:info@securrence.com) 12450 Wayzata Blvd Suite 315 Minnetonka, MN 55305

14. Questions or concerns regarding Thomas Allen's Privacy Practices may be directed to the Executive Director at 651-450-1802. Emails can be sent to [learn@thomasalleninc.com](mailto:learn@thomasalleninc.com)

15. This Privacy Policy will be routinely reviewed and updated as necessary. It is available for your review in the footer of Thomas Allen's websites.