



BESPOKE

Physical Therapy & Wellness

Privacy Policy

Effective Date: July 1, 2025

HIPAA COMPLIANT

HEALTHCARE PRIVACY

YOUR RIGHTS PROTECTED

This Privacy Policy describes how Bespoke Physical Therapy & Wellness collects, uses, discloses, and protects your personal and health information — including through our website, social media channels, and in-person services. As a healthcare entity, we are fully committed to compliance with the Health Insurance Portability and Accountability Act (HIPAA) and all applicable federal and state privacy laws.

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1. About This Policy

Bespoke Physical Therapy & Wellness ('we,' 'us,' 'our,' or 'the Practice') is committed to protecting the privacy of every individual who interacts with us — whether as a patient, website visitor, or follower on our social media platforms. This Privacy Policy ('Policy') explains what information we collect, why we collect it, how we use and protect it, and what rights you have regarding your information.

This Policy applies to information collected through: our website and any affiliated web properties; our social media pages (including Facebook, Instagram, and other platforms); in-person visits, forms, and intake paperwork; phone, email, and text communications; and any other means through which you interact with us.

This Policy is separate from, but should be read alongside, our Notice of Privacy Practices (NPP), which is provided to patients at the time of their first visit and governs the use and disclosure of Protected Health Information (PHI) under HIPAA.

2. Who We Are

Bespoke Physical Therapy & Wellness is a licensed healthcare provider and a Covered Entity as defined under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations (45 C.F.R. Parts 160 and 164). We provide physical therapy, wellness services, and related healthcare to individuals throughout the United States.

As a Covered Entity, we are legally required to maintain the privacy and security of your Protected Health Information (PHI) and to provide you with notice of our legal duties and privacy practices.

Privacy Contact: louc@bespokeptw.com

3. Information We Collect

3.1 Personal Information

We may collect the following categories of personal information:

- Identifiers: name, address, email address, phone number, date of birth
- Insurance and billing information: insurance carrier, policy numbers, payment details
- Clinical information: medical history, diagnoses, treatment notes, progress records
- Communications: messages you send us via email, our website, or social media platforms
- Appointment and scheduling information
- Emergency contact information

3.2 Information Collected Automatically Online

When you visit our website or interact with us online, we may automatically collect:

- IP address and device identifiers
- Browser type and operating system
- Pages viewed, time spent on pages, and referring URLs

- Cookies and similar tracking technologies (see Section 7)

3.3 Social Media Information

When you engage with our social media pages, we may collect:

- Your public profile name and handle
- Comments, messages, likes, shares, or other interactions you make on our pages
- Content you tag us in or send to us via direct message
- Aggregate analytics data provided by the social media platform (e.g., page reach, demographics)

Important: Do not share Protected Health Information (PHI) — such as diagnoses, treatment details, or insurance information — through social media platforms. Social media platforms are not HIPAA-compliant communication channels, and we cannot guarantee the security of information shared through them.

4. How We Use Your Information

We use the information we collect for the following purposes:

- Treatment: scheduling appointments, delivering physical therapy and wellness services, coordinating care with other providers
- Payment: verifying insurance coverage, processing payments, submitting claims
- Healthcare operations: quality assessment, staff training, auditing, improving our services
- Communications: responding to your inquiries, sending appointment reminders and follow-up information
- Legal compliance: fulfilling reporting obligations, responding to legal process, and maintaining required records
- Marketing and outreach: sharing general wellness tips, practice news, or community information through social media or email — always with your consent where required by law
- Safety: preventing fraud, abuse, or harm to patients or staff

We will not use your PHI for marketing purposes without your written authorization, as required by HIPAA.

5. HIPAA Notice of Privacy Practices

The following section constitutes a summary of our HIPAA Notice of Privacy Practices. The full Notice is provided to all patients at the time of their first visit and is available upon request. In the event of any conflict between this Policy and the full Notice of Privacy Practices, the Notice of Privacy Practices shall control with respect to Protected Health Information.

5.1 What Is PHI?

Protected Health Information (PHI) is any individually identifiable health information that relates to your past, present, or future physical or mental health or condition; the provision of healthcare to you; or the past, present, or future payment for your healthcare. PHI includes information in any format — written, oral, or electronic (ePHI).

5.2 Permitted Uses and Disclosures of PHI

We are permitted by law to use and disclose your PHI without your authorization for the following purposes:

- **Treatment:** We may share your PHI with other treating providers, specialists, hospitals, or care coordinators involved in your treatment.
- **Payment:** We may share your PHI with your health insurer or other payers to obtain payment for services rendered.
- **Healthcare Operations:** We may use your PHI for internal quality improvement, training, accreditation, auditing, and legal or compliance activities.
- **Required by Law:** We will disclose PHI when required by federal, state, or local law, including to public health authorities, law enforcement (under specific conditions), and oversight agencies.
- **Public Health Activities:** We may disclose PHI to prevent or control disease, injury, or disability.
- **Serious Threats:** We may disclose PHI to prevent a serious and imminent threat to the health or safety of a person or the public.
- **Abuse, Neglect, or Domestic Violence:** We may disclose PHI to government authorities authorized to receive such reports.
- **Workers' Compensation:** We may disclose PHI as authorized by workers' compensation laws.

5.3 Uses and Disclosures Requiring Your Authorization

All other uses and disclosures of your PHI require your written authorization, including:

- Use or disclosure of PHI for marketing purposes
- Sale of PHI
- Most uses of psychotherapy notes
- Use of PHI in a way not otherwise permitted by HIPAA

You may revoke any authorization at any time in writing. Revocation will not affect disclosures already made.

5.4 Electronic Protected Health Information (ePHI)

We comply with the HIPAA Security Rule and have implemented safeguards to protect ePHI, including:

- Encrypted electronic health record (EHR) systems
- Access controls and user authentication protocols
- Audit controls and activity logging
- Workforce training on privacy and security obligations
- Business Associate Agreements (BAAs) with all vendors who access ePHI on our behalf

5.5 Minimum Necessary Standard

When using or disclosing PHI, we make reasonable efforts to limit the information to the minimum necessary to accomplish the intended purpose (45 C.F.R. § 164.502(b)).

5.6 Breach Notification

In the event of a breach of unsecured PHI, we will notify affected individuals within 60 days of discovery, as required by the HIPAA Breach Notification Rule (45 C.F.R. Part 164, Subpart D). Breaches affecting 500 or more individuals will also be reported to HHS and, where required, prominent media outlets.

6. Social Media Privacy

We maintain social media pages to share wellness information and engage with our community. Please be aware of the following:

6.1 Public Nature of Social Media

Any information you post publicly on our social media pages may be seen by other users and the general public. We are not responsible for the privacy practices of third-party platforms.

6.2 No PHI on Social Media

Never share PHI through social media, public comments, or direct messages on any platform — these channels are not HIPAA-compliant. For sensitive health information, contact us directly by phone or through our secure patient portal.

6.3 Testimonials and Reviews

We will request written authorization before using any testimonial that includes health information in marketing materials. We will never post identifiable health information without express written consent.

6.4 Tagging and Mentions

We will not tag patients in treatment-related posts without express consent. If you tag us in a post containing health information, we may ask you to remove the tag.

6.5 Social Media Analytics

We may receive aggregate, de-identified analytics from social media platforms. We use this data only to improve our outreach and never link it to individual patient records.

7. Cookies & Online Tracking

Our website may use cookies and similar tracking technologies to enhance your experience and analyze usage patterns.

- **Essential cookies:** Necessary for the website to function properly.
- **Analytics cookies:** Help us understand how visitors use our website.
- **Marketing cookies:** Used to deliver relevant advertisements or track campaign effectiveness.

You may control cookies through your browser settings. We do not sell personal information collected through cookies.

8. How We Share Your Information

We do not sell your personal information. We may share it in these limited circumstances:

- **Healthcare providers:** With clinicians or specialists involved in your care, consistent with HIPAA
- **Business Associates:** With vendors performing functions on our behalf under signed Business Associate Agreements
- **Insurance and payers:** With your insurer or other payers for billing and reimbursement

- **Legal and regulatory authorities:** When required by law, court order, or government request
- **With your consent:** For any other purpose with your explicit written authorization

9. Your Privacy Rights

Depending on applicable law, you may have the following rights:

9.1 HIPAA Patient Rights

- **Right to Access:** Inspect and obtain a copy of your PHI within 30 days of a written request (45 C.F.R. § 164.524).
- **Right to Amend:** Request correction of PHI you believe is inaccurate or incomplete (45 C.F.R. § 164.526).
- **Right to an Accounting of Disclosures:** Receive a list of certain PHI disclosures from the previous six years (45 C.F.R. § 164.528).
- **Right to Request Restrictions:** Ask us to restrict certain uses or disclosures of your PHI (45 C.F.R. § 164.522).
- **Right to Confidential Communications:** Request communication about your PHI in a specific way or location (45 C.F.R. § 164.522(b)).
- **Right to Revoke Authorization:** Revoke any prior authorization in writing at any time.
- **Right to a Paper Copy of NPP:** Receive a paper copy of our Notice of Privacy Practices upon request.

9.2 General Privacy Rights (Non-PHI)

- **Opt-Out of Marketing:** Contact louc@bespokeptw.com or use the unsubscribe link in our emails.
- **Request Deletion:** Request deletion of personal information not required to be retained by law.
- **Request Correction:** Request correction of inaccurate personal information.
- **File a Complaint:** File a complaint with us or with the U.S. HHS Office for Civil Rights (OCR) at www.hhs.gov/ocr. We will not retaliate against you.

To exercise any of the above rights, submit a written request to louc@bespokeptw.com.

10. Data Security

We have implemented administrative, physical, and technical safeguards to protect your information, including:

- Encrypted storage and transmission of ePHI
- Secure, access-controlled systems with multi-factor authentication where applicable
- Regular security risk assessments consistent with the HIPAA Security Rule
- Workforce training on privacy and security practices
- Incident response and breach notification procedures

No method of electronic transmission or storage is 100% secure. We cannot guarantee absolute security.

11. Retention of Information

We retain patient medical records and PHI for a minimum of seven (7) years from the date of service, or longer where required by state law. Non-clinical personal information is retained only as long as necessary.

When information is no longer required, we will securely destroy or de-identify it.

12. Children's Privacy

We do not knowingly collect personal information from children under 13 through our website or social media without verified parental consent, consistent with COPPA. PHI for minor patients is handled in accordance with HIPAA and applicable state law.

If you believe we have inadvertently collected information from a child under 13 without proper consent, please contact us at louc@bespokeptw.com.

13. Third-Party Links

Our website and social media pages may link to third-party sites not operated by us. We have no control over their content or privacy practices and encourage you to review their privacy policies.

14. Changes to This Policy

We may update this Privacy Policy periodically. Material changes will be posted on our website with an updated Effective Date. For significant changes affecting PHI use, we will provide notice consistent with HIPAA.

Your continued use of our services after any changes indicates your acceptance of the updated Policy.

15. Contact Us

Questions, concerns, or requests regarding this Privacy Policy should be directed to our Privacy Officer:

Practice	Bespoke Physical Therapy & Wellness
Privacy Contact / Email	louc@bespokeptw.com
Role	Privacy Officer
Complaints	U.S. Dept. of Health & Human Services — Office for Civil Rights: www.hhs.gov/ocr

Disclaimer: This Privacy Policy is provided for informational purposes and does not constitute legal advice. Bespoke Physical Therapy & Wellness recommends consulting qualified legal counsel to ensure full compliance with all applicable federal and state privacy laws, including HIPAA, applicable state healthcare privacy statutes, and any platform-specific terms of service.