

Bluewater Radiology, PLLC

PRIVACY POLICY

Effective Date: September 14, 2026

Bluewater Radiology, PLLC ("we," "us," or "our") is committed to protecting the privacy and security of your personal, health, and digital information. This Privacy Policy ("Policy") describes the types of information we may collect from you or that you may provide when you: (i) visit our website at **bluewaterradiology.com** (the "Website"); (ii) receive radiology services at our practice; (iii) contact us by phone, email, or text message; or (iv) interact with us through any other channel. It also describes our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy is incorporated into and subject to our Terms of Use. **Please read this Policy carefully.** By accessing or using the Website or our services, you accept the practices described herein and consent to our collection, use, and disclosure of your information as set forth in this Policy. If any term is unacceptable to you, please do not use the Website or provide any personal information. This Policy may change from time to time; your continued use of the Website or services after we post changes constitutes your acceptance of those changes.

1. WHO WE ARE AND SCOPE OF THIS POLICY

Bluewater Radiology, PLLC is a radiology practice located at 1799 South Federal Highway, Boca Raton, FL 33432. As a healthcare provider, we are a "**Covered Entity**" under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and its implementing regulations. Our handling of Protected Health Information ("PHI") is governed by HIPAA and by our separately issued **Notice of Privacy Practices**, which is available at our practice and upon request. This Policy supplements — and does not replace — our Notice of Privacy Practices.

This Policy applies to information collected through the Website, at our clinic, and through other communications with us. It does not apply to information collected by third parties — including websites or applications that may link to or be accessible from the Website — whose privacy practices are governed by their own policies.

2. INFORMATION WE COLLECT

We collect several types of information from and about individuals who interact with us, including:

A. Health and Clinical Information

When you receive radiology services from us, we collect information necessary to provide care, including:

- Full name, date of birth, and government-issued identification
- Medical history, imaging orders, and referring physician information
- Radiology images (X-ray, MRI, CT, ultrasound, etc.) and diagnostic reports
- Insurance information and billing records
- Emergency contact information
- Prescription information and information about other treating providers

B. Contact and Demographic Information

We collect contact information you provide directly, including:

- Mailing address, phone number, and email address
- Preferred language and communication preferences
- Patient portal login credentials
- Whether you are a current or former patient, and your service interests

C. Website and Digital Information

When you visit our Website or use our patient portal, we may automatically collect:

- IP address, browser type, operating system, host domain, and device identifiers
- Pages visited, time spent on each page, referring URLs, and search queries on the Website
- Traffic data, location data (at the city or region level), language preferences, and date and time of access
- Information collected through cookies, web beacons, pixel tags, and similar tracking technologies (see Section 5)

This automatically collected information is primarily statistical and may or may not include personal information. We use it to improve the Website and to deliver a more personalized experience, including to estimate audience size, recognize returning visitors, and analyze usage patterns.

D. Information from Third Parties

We may receive information about you from third parties, including:

- Referring physicians, medical professionals, pharmacies, and other healthcare providers who coordinate your care with us
- Insurance companies and third-party payers involved in billing and claims processing
- Third-party service providers who assist with IT, analytics, and Website operations

We will combine information received from third parties with information you provide to us and information we collect automatically, and we will use the combined information for the purposes described in this Policy.

E. Communications

If you contact us by phone, email, text message, or through an online form, we may retain records of those communications — including your inquiry and our response — for quality assurance, continuity of care, and recordkeeping purposes.

3. HOW WE COLLECT YOUR INFORMATION

We collect information in the following ways:

- **Directly from you** — when you register as a patient, schedule an appointment, fill out intake or consent forms, contact us by any means, or submit information through the Website.
- **Automatically** — as you navigate through the Website, using cookies, web beacons, pixel tags, and other automated technologies described in Section 5.
- **From third parties** — including referring providers, insurance companies, and service providers, as described in Section 2(D).

4. HOW WE USE YOUR INFORMATION

We use the information we collect for the following purposes:

- **Treatment:** Providing, coordinating, and managing your radiological care; sharing information with referring physicians, specialists, and other treating providers as necessary to deliver care.
- **Payment:** Submitting claims to your health insurer or other payer, verifying insurance coverage, processing payments, and managing billing inquiries and disputes.
- **Healthcare Operations:** Quality assessment and improvement, compliance monitoring, staff training, accreditation activities, auditing, and general business management.
- **Appointment Scheduling and Reminders:** Contacting you to schedule, confirm, reschedule, or follow up on appointments, and to deliver pre-procedure instructions or post-procedure communications.
- **Patient Communications:** Sending administrative messages, test result notifications, and, where you have separately consented, text messages pursuant to our Text Messaging Terms of Use.
- **Marketing and Promotional Communications:** With your consent where required by law, informing you about our services, promotions, or updates. You may opt out of marketing communications at any time (see Section 9).
- **Website Improvement:** Analyzing how visitors use the Website to improve content, layout, performance, and user experience; estimating audience size; and recognizing returning visitors.
- **Personalization:** Storing information about your preferences to tailor the Website experience to your interests.
- **Safety and Fraud Prevention:** Detecting, preventing, and responding to fraud, abuse, security incidents, or threats to the health and safety of our patients, staff, or the public.

- **Legal and Regulatory Compliance:** Meeting our obligations under applicable federal and state law, including HIPAA, HITECH, Florida law, and any applicable federal or state billing regulations.
- **Business Transactions:** In connection with a merger, acquisition, reorganization, or sale of assets, as described in Section 7(G).
- **Any other purpose** for which we have obtained your consent or as otherwise permitted or required by applicable law.

5. COOKIES AND TRACKING TECHNOLOGIES

Our Website uses cookies and similar technologies to improve your experience, analyze site traffic, and support certain features. This section explains what these technologies are, how we use them, and what choices you have.

A. Types of Cookies We Use

- **Session Cookies (Temporary):** These cookies last only as long as your browser is open. They are used for technical purposes such as enabling navigation through the Website and maintaining your session while you are logged into the patient portal. Once you close your browser, these cookies are deleted.
- **Persistent Cookies:** These cookies are stored on your device for a longer period. We use them for purposes such as tracking the number of unique visitors, analyzing page views and time spent, recognizing returning visitors, and storing your preferences.

Cookies identify your browser to our servers but do not, by themselves, identify you personally. We do not use cookies to collect or store PHI.

B. Other Tracking Technologies

- **Pixel Tags / Web Beacons / Clear GIFs:** We may use these small electronic files, or similar means, to know when you visit the Website, to count users, and to gather aggregate non-personal data about Website usage.
- **Analytics:** We may use third-party analytics services to collect and analyze aggregate statistical data about Website traffic and usage. These services may use their own cookies and tracking mechanisms, subject to their own privacy policies.

C. Behavioral Tracking

We do **not** knowingly permit third-party advertising networks to collect your information through our Website for behavioral advertising purposes. We do not use Website tracking data to serve you interest-based advertisements on other websites.

D. Do Not Track

Some browsers include a "Do Not Track" (DNT) feature that signals to websites that you do not wish to be tracked. Because there is currently no agreed-upon standard for responding to DNT signals, our Website does not currently respond to DNT signals. This Policy describes our data practices in full, including the limited tracking we perform.

E. Your Cookie Choices

You can configure your browser to refuse all or some cookies, or to alert you when cookies are being sent. Please note that if you disable cookies, some features of the Website may not function properly. Most browsers include instructions for managing cookies in their Help section.

6. HOW WE SHARE YOUR INFORMATION

We do not sell, rent, or trade your personal or health information to any third party. We may disclose your information only as described in this section.

A. Disclosures Permitted or Required by HIPAA

As a Covered Entity, we may use and disclose your PHI without your authorization for treatment, payment, and healthcare operations, as described in our Notice of Privacy Practices. We may also disclose PHI as required by law — including to public health authorities, law enforcement agencies, or in response to valid court orders, subpoenas, or other legal process.

B. Business Associates

We share information with third-party vendors and service providers ("Business Associates") who perform functions on our behalf, including IT and hosting services, billing and coding, transcription, radiology reporting platforms, analytics, email delivery, and other operational support. All Business Associates are required to enter into a Business Associate Agreement and to protect your PHI in accordance with HIPAA.

C. With Your Authorization

For uses and disclosures not otherwise permitted or required by HIPAA — such as sharing your information for marketing purposes or disclosing it to certain third parties — we will obtain your prior written authorization. You may revoke any authorization at any time in writing; revocation will be effective going forward but will not affect actions taken in reliance on the authorization before it was revoked.

D. Text Messaging

Mobile information collected or shared in connection with our text messaging service will not be shared with third parties or affiliates for marketing or promotional purposes. All text messaging opt-in data and consent information will not be shared with any third parties. See our Text Messaging Terms of Use for complete details.

E. Service Providers and Operational Third Parties

We may share your information with third parties that assist us in operating the Website and delivering our services, including:

- Website hosting and infrastructure providers
- Data analysis and reporting services
- Customer service and support platforms
- Email and communication delivery services
- Auditing and compliance services

These providers are contractually required to use your information only to perform services on our behalf and to maintain appropriate security measures.

F. Legal Requirements and Protection of Rights

We may disclose your information if we believe in good faith that such disclosure is necessary to:

- Comply with any applicable law, regulation, legal process, or government request
- Enforce or apply our Terms of Use or other agreements, including for billing and collection purposes
- Detect, prevent, or address fraud, security incidents, or technical issues
- Protect the rights, property, or safety of our practice, our patients, our staff, or the public
- Respond to emergency situations involving a threat to life

G. Business Transfers

In the event of a merger, acquisition, reorganization, sale of all or a substantial portion of our assets, or similar transaction, your information — including personal information and health information — may be transferred to the successor entity. We will provide notice to affected individuals as required by applicable law, including HIPAA, before such information is transferred or becomes subject to a different privacy policy.

H. Aggregated or De-Identified Information

We may use and disclose aggregated or de-identified data — information that cannot reasonably be used to identify you — without restriction for research, quality improvement, business analysis, and other lawful purposes.

7. YOUR RIGHTS UNDER HIPAA

As our patient, you have the following rights with respect to your Protected Health Information. To exercise any of these rights, please submit a written request to our Privacy Officer (see Section 14).

- **Right to Access:** Request a copy of your medical records and billing information in paper or electronic format.
- **Right to Amend:** Request corrections to inaccurate or incomplete information in your health records. We may deny your request in limited circumstances, such as when the record was not created by us or is already accurate.
- **Right to an Accounting of Disclosures:** Request a list of certain disclosures we have made of your PHI, covering up to six years prior to the date of your request.
- **Right to Restrict:** Request that we restrict how we use or disclose your PHI for treatment, payment, or healthcare operations. We are not always required to agree, except where you have paid out-of-pocket in full for a service and request that we not disclose the information to your health plan.

- **Right to Confidential Communications:** Request that we contact you in a specific way or at a specific location (for example, only by mail at a particular address).
- **Right to a Paper Copy of Our Notice:** Obtain a paper copy of our Notice of Privacy Practices at any time, even if you have agreed to receive it electronically.
- **Right to Opt Out of Text Messages:** Reply STOP to any text message from us to unsubscribe from that communication channel, as described in our Text Messaging Terms of Use.
- **Right to File a Complaint:** If you believe your privacy rights have been violated, you may file a complaint with our Privacy Officer or with the U.S. Department of Health and Human Services, Office for Civil Rights. Filing a complaint will not result in any retaliation against you.

8. YOUR CHOICES AND CONTROLS

A. Cookies

You may configure your browser to refuse or delete cookies at any time. Instructions are typically found in your browser's Help or Settings menu. Disabling cookies may limit certain Website functionality.

B. Marketing Communications

If you do not wish to receive promotional or marketing communications from us, you may opt out at any time by: (i) following the unsubscribe instructions in any marketing email we send you; (ii) replying STOP to any marketing text message; or (iii) contacting us directly at info@bluewaterradiology.com or 561-210-9568. Please note that opting out of marketing communications will not affect our ability to send you administrative or care-related communications, such as appointment reminders, billing notices, or responses to your inquiries.

C. Do Not Track

Our Website does not currently respond to browser-level Do Not Track signals. See Section 5(D) for details.

D. Text Messages

You may opt out of text communications at any time by replying STOP, QUIT, END, REVOKE, OPT OUT, CANCEL, or UNSUBSCRIBE to any text message from us. See our Text Messaging Terms of Use for complete details.

9. ACCESSING, CORRECTING, AND DELETING YOUR INFORMATION

You may contact our Privacy Officer (see Section 14) to request access to, correction of, or deletion of personal information you have provided to us, subject to the following:

- We will honor access and correction requests in accordance with HIPAA and applicable state law.

- We may be unable to delete certain information where retention is required by law, regulation, or our records retention policy, or where deletion would impair your ongoing care.
- We may deny a request to change information if we believe the change would violate any law or legal requirement, or cause the information to be incorrect.
- Even after we delete information from our active systems, copies may remain in backup systems for a period of time.
- If you believe your personal information has been unlawfully processed, you have the right to object. We will assess and respond to such objections in accordance with applicable law.

Where our legal basis for processing is your consent, you may withdraw consent at any time without affecting the lawfulness of processing that occurred before withdrawal.

10. HOW WE PROTECT YOUR INFORMATION

Bluewater Radiology, PLLC implements administrative, physical, and technical safeguards designed to protect your information from unauthorized access, use, alteration, or disclosure, including:

- Encrypted data transmission (TLS/SSL) and encrypted storage for electronic PHI
- Role-based access controls limiting PHI access to authorized personnel on a need-to-know basis
- Multi-factor authentication for systems containing patient data
- Physical security measures at our facility, including controlled access to record storage areas
- Regular workforce training on HIPAA compliance, data security, and phishing awareness
- Periodic risk assessments, vulnerability scanning, and security audits
- Incident response procedures for detecting, containing, and reporting security breaches

Despite these measures, no method of data transmission over the internet or electronic storage is completely secure. We cannot guarantee the absolute security of your information. If you believe your information may have been compromised, please contact us immediately at the contact information in Section 14. We will notify affected individuals of any breach affecting their PHI in accordance with HIPAA and applicable state law.

If you have been issued a password to access any part of our Website or patient portal, you are responsible for keeping that password confidential. Do not share your password with anyone.

11. RETENTION OF RECORDS

We retain records in accordance with applicable federal and state law:

- Adult patient medical records are retained for a minimum of five (5) years from the date of service under Florida law.
- Records for minor patients are retained until the patient reaches age 18, plus four (4) additional years, or five (5) years from the date of service, whichever is longer.
- Billing and administrative records are retained in accordance with applicable Medicare, Medicaid, and other regulatory requirements.
- Website and digital records (logs, analytics) are retained for limited operational periods and then deleted or de-identified.

After applicable retention periods, records will be destroyed using secure methods appropriate to the sensitivity of the information.

12. THIRD-PARTY WEBSITES AND LINKS

Our Website may contain links to third-party websites, applications, or services that are not operated or controlled by us. This Policy does not apply to those third-party sites, and we are not responsible for their privacy practices, content, or data security. We encourage you to review the privacy policy of any third-party site you visit. The inclusion of a link on our Website does not imply our endorsement of the linked site.

13. CHILDREN'S PRIVACY

We provide radiology services to patients of all ages, including minors. For patients under the age of 18, we collect and use health information in accordance with HIPAA and applicable Florida law. Parents or legal guardians may exercise HIPAA rights on behalf of minor patients, subject to certain limitations under state law (for example, where a minor has an independent right to consent to certain types of care).

With respect to our Website, we do not knowingly collect personal information online from children under the age of 13 without verifiable parental consent, as required by the Children's Online Privacy Protection Act ("COPPA"). If we discover that we have inadvertently collected personal information from a child under 13 without parental consent, we will delete that information promptly. If you are a parent or guardian and believe we may have collected information from your child without proper consent, please contact us at the information in Section 14.

14. CALIFORNIA PRIVACY RIGHTS

If you are a California resident, California Civil Code Section 1798.83 permits you to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes during the preceding calendar year. To make such a request, or to exercise any other rights you may have under California law, please contact us in writing at the address in Section 15.

California residents may also have additional rights under the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), including the right to know what personal information we collect, the right to delete personal information, the right to opt out of the sale or sharing of personal information (we do not sell or share personal information), and the right to non-discrimination for exercising your rights. To exercise these rights, please contact our Privacy Officer.

15. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or modify this Policy at any time. When we make material changes, we will post the updated Policy on our Website with a revised effective date. For changes that materially affect how we handle your PHI, we will update our Notice of Privacy Practices in accordance with HIPAA requirements and provide additional notice where required by law. Your continued use of our Website or services following the posting of changes constitutes your acceptance of the updated Policy. We encourage you to review this Policy periodically.

16. CONTACT US — PRIVACY OFFICER

If you have questions or concerns about this Privacy Policy, wish to exercise any of your rights described herein, or believe your privacy has been violated, please contact our Privacy Officer:

Bluewater Radiology, PLLC Attn: Privacy Officer 1799 South Federal Highway, Boca Raton, FL 33432 Phone: 561-210-9568 Email: info@bluewaterradiology.com Website: bluewaterradiology.com

You also have the right to file a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, at www.hhs.gov/ocr, if you believe your HIPAA rights have been violated. Filing a complaint with our practice or with HHS will not result in any retaliation against you.

Bluewater Radiology, PLLC

TEXT MESSAGING TERMS OF USE

By "Opting In" to or using a "Text Message Service" (as defined below) from **Bluewater Radiology, PLLC**, you accept these Terms & Conditions.

This agreement is between you and **Bluewater Radiology, PLLC** or one of its affiliates. All references to "**Bluewater Radiology, PLLC**," "we," "our," or "us" refer to Bluewater Radiology, PLLC, 1799 S Federal HWY, Boca Raton, FL 33432.

DEFINITIONS

"**Opting In**," "**Opt In**," and "**Opt-In**" refer to requesting, joining, agreeing to, enrolling in, signing up for, acknowledging, responding to, or otherwise consenting to receive one or more text messages.

"**Text Message Service**" includes any arrangement or situation in which we send one or more messages addressed to your mobile phone number, including text messages (such as SMS, MMS, or successor protocols or technologies).

CONSENTING TO TEXT MESSAGING

By consenting to receive text messages from us, you agreed to these Text Messaging Terms and Conditions, as well as our Privacy Policy (available at bluewaterradiology.com), incorporated herein by reference.

E-SIGN DISCLOSURE

By agreeing to receive text messages, you also consent to the use of an electronic record to document your agreement. You may withdraw your consent to the use of the electronic record by replying STOP.

TEXT MESSAGE SERVICE PRIVACY POLICY

We respect your privacy. We only use information you provide through this service to transmit your mobile messages and respond to you. This includes, but is not limited to, sharing information with platform providers, phone companies, and other vendors who assist us in the delivery of mobile messages. Mobile information will not be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. Nonetheless, we

reserve the right always to disclose any information as necessary to satisfy any law, regulation or governmental request, to avoid liability, or to protect our rights or property. This Text Message Service Privacy Policy applies to your use of the Text Message Service and is not intended to modify our general Privacy Policy, incorporated by reference above, which may govern the relationship between you and us in other contexts.

COSTS OF TEXT MESSAGES

We do not charge you for the messages you send and receive via this text message service. Message and data rates may apply, depending on your plan with your wireless or other applicable provider. You may be charged by your carrier or other applicable provider.

FREQUENCY OF TEXT MESSAGES

This Text Messaging Service is for conversational person-to-person communication between you and our employees. We may send you an initial message providing details about the service. After that, the number of text messages you receive will vary depending on how you use our services and whether you take steps to generate more text messages from us (such as by sending a HELP request).

OPTING OUT OF TEXT MESSAGES

If you no longer want to receive text messages, you may reply to any text message with STOP, QUIT, END, REVOKE, OPT OUT, CANCEL, or UNSUBSCRIBE. As a person-to-person communication service, opt-out requests are specific to each conversation between you and one of our employees and their associated phone number. After unsubscribing, we may send you confirmation of your opt-out via text message.

CONTACT US

For support, please contact us at:

Bluewater Radiology, PLLC

1799 S Federal HWY, Boca Raton, FL 33432

Phone: 561-210-9568

Email: info@bluewaterradiology.com