

My Health My Data Policy

This Washington Consumer Health Data Privacy Policy ("Policy") applies only to personal data defined as "Consumer Health Data" by the Washington My Health My Data Act ("MHMDA") and that is collected from individuals in Washington by Nadejda Besspalova MD PLLC ("Practice", "we", "us") when they interact with our website. This Policy does not apply to information that MHMDA exempts, including protected health information ("PHI") governed by HIPAA, health care information collected, used, or disclosed in accordance with chapter 70.02 RCW, patient identifying information governed by 42 CFR Part 2, and information that originates from and is intermingled to be indistinguishable with that information in the records we maintain as a health care provider. Those records are described in our Notice of Privacy Practices. Consumer Health Data under MHMDA means personal information that is linked or reasonably linkable to a consumer, and that identifies the consumer's past, present, or future physical or mental health status. Physical or mental health status includes, among other things, health conditions, treatment, diagnoses, medications, and data that identifies a consumer seeking health care services.

Consumer Health Data we may collect:

- Internet or Network Activity Information when you interact with our website (e.g. Internet Protocol (IP) address) which could identify your attempt to seek health care services or information.
- Contact information provided by you to our secure calendar system to schedule an initial consultation.

Sources of Consumer Health Data

We collect Consumer Health Data from the following categories of sources:

- Directly from you, when you submit a scheduling request, contact form, or other communication through our website;
- Automatically from your device or browser when you visit our website, such as your IP address and similar identifiers; and
- From the service providers that operate our website and our scheduling system on our behalf.

Purpose of Collecting and Using Consumer Health Data

We use Consumer Health Data only for the purposes allowed under MHMDA, including:

- Responding to your inquiries related to health related service access
- Securing, operating, and improving our website and form systems
- Meeting legal or compliance obligations

We do **not** use Consumer Health Data for targeted advertising.

We do **not** share Consumer Health Data with advertising or cross site tracking vendors.

We do **not** share Consumer Health Data for marketing.

We do **not** sell Consumer Health Data.

We do **not** use geofencing technologies to identify or track consumers within 2,000 feet of a healthcare facility. This practice is prohibited under MHMDA.

We maintain reasonable administrative, technical, and physical safeguards designed to protect Consumer Health Data, including access controls and encryption in transit. We also restrict access to Consumer Health Data to the employees and service providers who need it for the purposes described in this Policy.

Data Retention

We retain Consumer Health Data only as long as necessary to fulfill the purposes described in this Policy or as required by law.

Changes to This Policy

We may update this Policy from time to time. For example, we may update this Policy when there are changes in our services, changes in our practices, or changes in the law. The updated version will be posted with a new Effective Date. If we want to collect, use, or share additional categories of Consumer Health Data, or to use Consumer Health Data for a purpose not described in this Policy, we will first disclose the additional category or purpose and obtain your affirmative consent before we do so. Your continued use of our website is not consent for these purposes. When changes to this Policy are material, we will inform you.

Sharing Consumer Health Data with Third Parties

Most of the data our Practice shares is excluded from MHMDA because it is PHI under HIPAA or other separately regulated health care information described above . Sharing of

any data we collect that is excluded from MHMDA will be detailed where those data are collected and described in our Notice of Privacy Practices

We will only share your Consumer Health Data with trusted partners and only for the services you have consented to, or to the extent necessary to provide a product or service that you have requested or comply with applicable law. The categories of Consumer Health Data we share include:

- Contact information provided by you to our secure calendar system to schedule an initial consultation; and
- Internet or Network Activity Information when you interact with our website (e.g. Internet Protocol (IP) address).

All such third parties are prohibited from using your Consumer Health Data except to provide these services to our Practice, and they are required to maintain the confidentiality of your Consumer Health Data.

We share Consumer Health Data with the following categories of third parties and affiliates:

- Our scheduling and calendar vendor;
- Professional advisors, regulators, and law enforcement, where required by law; and;

We require each service provider that processes Consumer Health Data on our behalf to do so under a binding contract that sets out our processing instructions and limits what the provider may do with the data.

Your Rights and How to Exercise Them

You have the following rights under MHMDA, subject to certain exceptions:

- Confirm whether we collect, share, or sell your Consumer Health Data, and access that data;
- Withdraw your consent to our collection and sharing of your Consumer Health Data; and
- Request deletion of your Consumer Health Data.

You may exercise any of these rights by submitting a written request using the contact details found at the end of this Policy. We will take reasonable steps to verify your identity and will respond no later than 45 days after we receive your request. If we refuse to act on your request, you may appeal by responding to our decision in writing within a reasonable time after you receive it. We will inform you in writing of the action taken or not taken on your appeal, including a written explanation of our reasons, within 45 days of receiving your appeal. If your appeal is denied, you may raise a concern or lodge a complaint with the Washington State Attorney General at www.atg.wa.gov/file-complaint.

Contact Information

If you have questions about this Policy or wish to exercise your rights under MHMDA, please contact us at:

Privacy Officer: Nadejda Beshpalova MD

Phone: 206-552-9659

Email: nbeshpalova@nadejdabeshpalovamd.com

Mail: 200 1st Ave West, Suite 403, Seattle, WA 98119

Effective Date

This Notice is effective as of September 1, 2026.