

Corporate Compliance	
Policy: Patient Privacy	Effective Date: 06/2008
Administrative Approval:	Reviewed: 07/2019 Revised: 8/31/2026

Policy

NAVIX Diagnostix, Inc. (“NAVIX”) respects and recognizes the importance of protecting the confidentiality and privacy of its patients in accordance with applicable state and federal laws.

The federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule establishes responsibilities with regard to patient health information in addition to patient rights regarding their own health information. NAVIX is required to protect the privacy of patient healthcare information and to provide appropriate safe guards to ensure the information is kept private and confidential.

For the purposes of HIPAA, NAVIX Diagnostix is considered an indirect service provider. A health care provider is considered to have an indirect treatment relationship with a patient when:

- The provider delivers a health care service based on the orders of another healthcare provider; and
- The results of the service are reported to the health care provider who ordered the service, rather than the patient.

NAVIX satisfies both of these requirements as all diagnostic testing services are provided under a health care provider’s order and the results are provided to the ordering physician not directly to the patient.

NAVIX however; must provide a notice of privacy to any patient who requests it. The notice of privacy explains how NAVIX uses a patient’s personal health information.

All of NAVIX HIPAA policies and procedures are contained in the HIPAA Privacy and Security Policies Manual. The manual is available on the NAVIX Intranet and a print version is available in the Compliance Officer’s office.

Procedure

1. Privacy Officer

NAVIX designates a Compliance Officer to serve as its Privacy Officer. The Privacy Officer is responsible for the development, implementation, and enforcement of NAVIX's HIPAA privacy policies and for receiving and responding to patient questions and complaints regarding the handling of protected health information (PHI).

2. Safeguarding Patient Information

NAVIX maintains administrative, physical, and technical safeguards designed to protect the confidentiality, integrity, and availability of PHI, including:

- Restricting access to PHI to workforce members whose job duties require it (the "minimum necessary" standard);
- Requiring unique user credentials and password protection for systems that store or transmit PHI;
- Securing physical records and work areas where PHI is accessible; and
- Encrypting PHI transmitted electronically wherever feasible.

3. Notice of Privacy Practices

Upon request, NAVIX will provide a patient, or the patient's personal representative, with a copy of its Notice of Privacy Practices, which describes how NAVIX may use and disclose PHI and describes the patient's rights with respect to that information. The Notice of Privacy Practices is available upon request from the Compliance Officer's office.

4. Patient Rights

Consistent with HIPAA, NAVIX will honor a patient's right to:

- Request access to, and a copy of, their PHI;
- Request an amendment to their PHI;
- Request an accounting of certain disclosures of their PHI;
- Request restrictions on certain uses and disclosures of their PHI;
- Request confidential communications; and
- File a complaint regarding NAVIX's privacy practices without fear of retaliation.

Requests should be directed in writing to the Compliance Officer and will be addressed within the timeframes required by HIPAA.

5. Workforce Training

All NAVIX workforce members receive training on HIPAA privacy requirements and this policy at the time of hire and periodically thereafter. Workforce members must acknowledge their understanding of, and agreement to comply with, NAVIX's privacy policies.

6. Reporting Privacy Concerns and Breaches

Any workforce member who becomes aware of a suspected or actual unauthorized use or disclosure of PHI must report the incident to the Compliance Officer immediately. NAVIX will investigate all reported incidents and will provide any notifications required by the HIPAA Breach Notification Rule and applicable state law.

7. Sanctions

Workforce members who fail to comply with this policy or applicable privacy laws are subject to disciplinary action, up to and including termination of employment, consistent with NAVIX's disciplinary policies.

8. Record Retention

Documentation related to this policy, including privacy complaints, breach investigations, and training records, is retained in accordance with NAVIX's record retention schedule and applicable law.

SMS Messaging Terms of Service

NAVIX may offer patients, referring providers, and other authorized individuals the option to receive text messages (SMS/MMS) related to appointment reminders, scheduling, test status updates, billing, and other administrative communications ("Text Messages"). Participation is voluntary and is governed by the following terms:

1. Consent. By providing a mobile phone number and opting in, whether verbally, in writing, or electronically, the recipient consents to receive Text Messages from NAVIX or its authorized vendors at the number provided. Consent to receive Text Messages is not a condition of receiving treatment or services from NAVIX.

2. Scope of Messages. Text Messages may include appointment reminders, scheduling confirmations, requests to contact NAVIX's office, and billing notices. Consistent with

NAVIX's HIPAA obligations, NAVIX will limit the PHI included in Text Messages and will not transmit diagnostic results or other sensitive clinical information by text unless the recipient has separately authorized that method of communication.

3. Message Frequency. Message frequency varies based on the recipient's scheduled appointments and account activity.

4. Message and Data Rates. Message and data rates may apply. Charges are the responsibility of the recipient and depend on the recipient's mobile carrier and plan.

5. Opt-Out. A recipient may opt out of Text Messages at any time by replying "STOP" to any message received, or by contacting the Compliance Officer using the information below. NAVIX may communicate through alternative means, such as mail, phone, or the patient portal, with individuals who opt out.

6. Help. A recipient may reply "HELP" to any Text Message, or contact NAVIX directly, for assistance.

7. Supported Carriers. Text Messages are supported by major U.S. wireless carriers. NAVIX and its carriers are not liable for delayed or undelivered messages.

8. Eligibility. The Text Messaging program is intended for individuals who are at least 18 years of age, or the parent or legal guardian of a minor patient providing consent on the minor's behalf.

9. Changes to These Terms. NAVIX may update this SMS Messaging Terms of Service from time to time. Continued participation in the Text Messaging program after changes are posted constitutes acceptance of the revised terms.

10. Contact. Questions regarding this SMS Messaging Terms of Service, or NAVIX's privacy practices generally, may be directed to the Compliance Officer.