

# Aspire Website Privacy Policy

#### **POLICY STATEMENT:**

Aspire has created this security and privacy statement in order to document and communicate its commitment to doing business with the highest ethical standards and appropriate internal controls.

Aspire respects the privacy of visitors to our website. Information entrusted to Aspire will be handled with the greatest of care, and Aspire will not use the information in ways to which you have not consented or is not required by law. The following discloses the information gathering and dissemination practices for www.aspireindiana.org.

# **PURPOSE:**

**Sites Covered by this Policy -** This Privacy Policy applies to all Aspire - owned websites and domains, and our wholly owned subsidiaries.

**Links to Other Sites -** This site contains a number of links to other sites. Aspire is not responsible for the security or privacy practices of these sites, the products or services offered by these sites, or the content appearing at these sites. Aspire does not endorse any of the products or services marketed at these other sites.

#### PROCEDURE:

Aspire recognizes the importance of keeping the information we collect about you confidential. We always take great care to protect what you entrust to us. Aspire is committed to protecting the privacy of visitors to our website.

#### INVOLUNTARY COLLECTION OF YOUR PERSONAL INFORMATION:

We do not automatically collect personally identifiable information (PII) about our website visitors. We collect non-personally identifiable information about your computer hardware and software. This information can include your IP address, browser type, access times, and referring web site addresses. Aspire keeps track of the web sites and pages our reviewers visit within <a href="www.aspireindiana.org">www.aspireindiana.org</a> in order to determine what services and pages are the most popular. This information is used by us to enhance the operation of our web site and web pages, to maintain their quality, and to provide general statistics regarding their use.

**Explicit Information Gathering -** You can examine our entire web site without providing any information whatsoever. Our website "Subscribe Today!" form requires users to give us contact information. This information is used to provide connections to our organization newsletter for those who inquire about our various services, programs and upcoming news. This information is also used to get in touch with customers when necessary. From time to time, the information gathered through this site will be used to notify you about products and services that we think will be of interest to you.

**Covert Information Gathering -** Our site does not covertly capture information regarding the specific activities of any particular user. We do not have any arrangements with any other sites to track or monitor user activities on the Web. Our site does, however, produce reports that permit us to view your activity on our site in anonymous or aggregated form.

#### VOLUNTARY COLLECTION OF YOUR PERSONAL INFORMATION:

Please refer to our Terms and Conditions.

#### **USE OF YOUR PERSONAL INFORMATION:**

Aspire does not collect, use, or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent. Aspire will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- 1. Conform to the edicts of the law or comply with the legal process served on the site.
- 2. Protect and defend the rights or property of Aspire.
- 3. Act under exigent circumstances to protect the personal safety of Aspire's clients or the public.

#### **TCPA COMPLIANCE:**

Aspire leverages SMS enabled communication systems to connect and drive consumer engagement. When a consumer opts to allow Aspire to communicate with them via SMS they are also given the ability to opt out of SMS communication by way of a reply to the message of STOP or asking for the Aspire employee to remove them from the communication list. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the stated categories in this privacy policy exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. To ensure SMS compliance for business-to-consumer communications, especially when involving patient health information (PHI), all Aspire employees will adhere to these key principles:

1. Obtain explicit documented consent from recipients,

- 2. Comply with the Telephone Consumer Protection Act (TCPA) to avoid unwanted messages,
- 3. Safeguard patient privacy by strictly adhering to HIPAA regulations, including the Privacy Rule, Security Rule, HITECH Act, and Indiana-specific laws,
- 4. Implement robust security measures to protect PHI, and
- 5. Regularly review and update compliance policies and procedures to stay current with evolving regulations.

# Statement programmed into initial SMS:

Consumer privacy is important to Aspire. "No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the stated categories in this privacy policy exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. End users can opt out of receiving further messages by replying STOP or ask for more information by replying HELP. Message frequency varies. Message and data rates may apply. To review Aspire's Privacy Policy visit this link <u>Privacy Policy</u>."

# **USE OF COOKIES:**

We may use "cookies" to help you personalize our online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issues the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize Aspire's pages, or register with our site or services, a cookie helps us to recall your specific information on subsequent visits. When you return to the same Aspire website, the information you previously provided can be retrieved, so you can easily use the features that you customized.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of Aspire's services or web sites you visit.

# **CHANGES TO THIS STATEMENT:**

Aspire will occasionally update this privacy policy to reflect company and client feedback. Aspire encourages you to periodically review this statement to be informed of how we are protecting your information.

#### **CONTACT INFORMATION:**

Aspire welcomes your comments regarding this privacy policy. If you believe that Aspire has not adhered to this policy, please contact us at 317-587-0500, or Compliance@AspireIndiana.org. We will use commercially reasonable efforts to promptly determine and remedy the problem.

Approved: CCC - 6-15-11
Revised: CCC - 9-16-15
Revised: CCC - 12-XX-22
Approved: CCC - 5/17/2023
Approved: Aspire Indiana Health, Inc. Board:6/28/2023
Approved: Aspire Indiana Health, Inc. Board - 4/23/2025