IMA MEDICAL GROUP | PRIVACY

FINAL REVIEW DRAFT - PRIVACY / LEGAL / WEB

IMA Medical Group Website Privacy Policy

Medical Home Alliance, LLC d/b/a IMA Medical Group

Effective date: October 15, 2026

What this policy covers

This policy explains IMA Medical Group's public website and campaign-page data practices, including current website analytics, contact forms, prospective-patient leads, the separate Salesforce lead flow for AEP pages, and the PHI-Free Tracking architecture used for approved AEP campaign measurement.

It does not replace the Medical Group Notice of Privacy Practices, which governs protected health information maintained by IMA in connection with health care.

Contents

1. Who IMA is and when this policy applies
2. Information we collect
3. Website functions and third-party services
4. Cookies, analytics, advertising, and campaign measurement
5. How we use information
6. How we disclose information
7. Communications and consent
8. Your choices and privacy requests
9. Retention
10. Children's privacy
11. Data security
12. Changes to this policy
13. Contact us

1. Who IMA is and when this policy applies

Medical Home Alliance, LLC d/b/a IMA Medical Group ("IMA," "we," "us," or "our") is a health care provider organization within the Millennium Physician Group (“MPG”) family of health care organizations. IMA provides

general, non-confidential information about its providers, clinics, services, wellness resources, and patient-facing resources through its public website and related online experiences.

This Website Privacy Policy governs your access to and use of the IMA Website.

For purposes of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), IMA participates in the affiliated covered entity described in the Medical Group Notice of Privacy Practices (the "NPP"). The NPP explains how participating health care entities may use and disclose protected health information ("PHI") and describes patient rights. When information collected through the Website becomes PHI maintained by IMA or another participating covered entity, the NPP and applicable health privacy laws govern that information.

Scope of this Website Privacy Policy

This Website Privacy Policy applies to www.imamedicalgroup.com and to IMA-branded landing pages, microsites, and campaign pages that link to this policy (collectively, the "Website"). It applies when you browse the Website, use provider or clinic search tools, interact with Website features, submit a Contact Us, Become a Patient, General Inquiry, Annual Enrollment Period ("AEP"), or other public form, or communicate with IMA in response to a Website request.

The Website is intended for general information and public-facing requests. It is not an emergency or clinical communication channel. Call 911 for an emergency. Current patients should use the patient portal or contact their clinic for medical questions, appointments, prescriptions, test results, or detailed clinical information.

What this policy does not cover

This policy does not govern information collected directly through a password-protected patient portal, medical record system, telehealth platform, or other secure health care environment. Such information may be PHI and is governed by the NPP and applicable law.

The Website may link to services operated by third parties, including patient portals, medical-record request services, bill-payment services, career sites, mapping and directions services, social media platforms (e.g., Facebook/Meta), and other external resources. When you leave the Website or submit information directly to a third party, that service may have its own privacy policy and terms. A third party may also process information on IMA's behalf under contractual, privacy, security, and HIPAA requirements, as applicable.

Please note: **Social media platforms and external links do not act as HIPAA Business Associates on our behalf.**

2. Information we collect

We collect information directly from you, automatically through the Website, and from approved affiliates or service providers when relevant to your request, a campaign, security, or another permitted business purpose. Depending on the context, information submitted to a health care provider may become PHI when it is maintained by IMA in connection with health care.

Category	Examples
Identifiers and contact information	Name, e-mail address, telephone number, mailing address, and age or date-of-birth information when a form specifically requests it.
Prospective-patient and routing information	ZIP code, county, preferred clinic or provider, caregiver status, Medicare eligibility or enrollment-related responses when requested, referral source, campaign source, and contact preferences.
Inquiry and communication content	Messages, attachments, feedback, survey responses, and other information you choose to provide. General public forms are solely intended for general prospective-patient inquiries, scheduling requests, or contact preferences, and not for detailed clinical information.
Internet and device activity	IP address, browser and device type, operating system, language, pages viewed, search activity, referral URL, campaign parameters, interactions with Website content, and form-submit or conversion events.
Approximate location and device context	Approximate location derived from IP address or device settings, local time, time zone, and similar technical context.
Consent and preference records	The notice or consent language displayed, its version or date, the source page or campaign, the time of submission, and the choices you make.
Service and referral information	Limited appointment-request, clinic, provider, insurance, referral, or service information received through a Website feature or supported service. Payment or medical-record information, when available through an external service, may be collected directly by that provider rather than IMA.

How we collect information

- Directly from you when you complete a Website form, request information, communicate with us, participate in a survey, or otherwise provide information.
- Automatically through server logs, cookies, tags, analytics tools, campaign parameters, and similar technologies when you browse or interact with the Website.
- Through Website features and approved service providers that support provider and location search, mapping, translation, social content, patient resources, campaign measurement, security, and other Website functions.
- From affiliates, referral sources, campaign partners, and other permitted sources when relevant to a request, campaign, security function, or business purpose.

How Website forms are routed

On the current IMA production website, general “Contact Us,” “Become a Patient,” and “General Inquiry” submissions may be delivered by e-mail to authorized IMA workforce members for review and routing. IMA AEP landing-page forms use a separate approved integration: user-entered information is sent through approved

MPG-controlled infrastructure, associated with the appropriate brand and campaign, and routed to authorized internal teams. Lead-form information is kept separate from the data used for advertising and analytics measurement.

3. Website functions and third-party services

The Website uses internal and third-party services to provide public information and connect users to supported resources. The service provider and data flow may vary by feature.

Function	Service / Provider	Purpose
Provider and clinic information	IMA Website; Atlist; Google Maps	Search and display provider, clinic, hours, services, and directions information.
Patient portal	Athena	Provides access to the patient portal through an external, secure service.
Medical records	Sharecare	Supports patient and third-party medical-record requests through an external workflow.
Bill payment	healowPay or another approved payment service	Supports online payment or redirects users to the payment service.
Careers	Workday	Hosts job postings and employment applications.
Translation	Weglot	Provides Spanish-language and other supported translation functionality.
Social media content	Instagram / Meta	Displays or links to social media content. Social platforms may receive technical and interaction information when their content is loaded or selected.
Analytics and campaign measurement	Current IMA site: Google Analytics and approved website tools; IMA AEP pages: Google Analytics, Google Ads and Meta measurement tools, tag management, and MPG-controlled Google Cloud services	Measures Website use and approved campaign or conversion performance under the context-specific configuration described below.

4. Cookies, analytics, advertising, and campaign measurement

Cookies and similar technologies

We and our service providers may use session and persistent cookies, web beacons, tags, server logs, or similar technologies for Website operation, security, preferences, analytics, and approved campaign measurement. You can restrict or delete cookies through your browser and through a Website preference tool where one is provided. Some Website functions may not work as intended if cookies are disabled.

Approved measurement tools

Depending on the page and approved configuration, IMA uses or may use Google Analytics, Google Ads conversion measurement, Meta measurement tools, tag management, conversion events, server logs, and similar technologies to understand Website use, attribute campaign sources, and measure whether a campaign led to a completed form or other approved action.

PHI-free tracking and sensitive-data protections

IMA uses website analytics and measurement technologies to understand Website activity, evaluate performance, and measure the effectiveness of approved digital communications and campaigns. These technologies may collect limited technical, device, and interaction information, subject to applicable privacy and security requirements.

IMA does not use protected health information (PHI), patient records, or information submitted through public Website forms to target advertisements, create advertising audiences, or engage in PHI-based retargeting or remarketing. Information voluntarily submitted through Website forms is used for appropriate business purposes, including responding to inquiries, managing prospective-patient requests, and facilitating authorized follow-up. This information is handled separately from advertising and analytics measurement activities.

IMA is implementing enhanced privacy-protective tracking controls across applicable Website experiences. Where deployed, MPG's PHI-Free Tracking architecture uses MPG-controlled infrastructure and server-side safeguards designed to filter or prevent PHI, direct identifiers, user-entered form information, and other sensitive data from being transmitted to downstream advertising or analytics providers. These controls are being implemented across designated Website experiences and are not yet deployed uniformly throughout the existing IMA Website.

IMA maintains privacy and security safeguards intended to protect information collected through its Website and periodically reviews its tracking technologies, data disclosures, and technical controls to help prevent unauthorized access, use, or disclosure of sensitive information. Visitors should avoid submitting detailed medical or treatment information through general public Website forms and should use the patient portal or contact their clinic for clinical communications.

5. How we use information

- Operate, maintain, secure, troubleshoot, and improve the Website and its functions.
- Respond to inquiries and provide information, services, or resources you request.
- Create, route, and manage prospective-patient, AEP, or campaign leads and coordinate follow-up by authorized internal teams.
- Support provider and clinic searches, location resources, patient resources, records requests, payment access, and other Website functions.
- Attribute campaign sources, measure conversions, evaluate Website content, and analyze aggregate Website use.

- Communicate with you through channels you request or authorize, subject to consent, preference, and suppression requirements.
- Provide newsletters, promotions, or marketing communications only where permitted and supported by any consent or authorization that may be required.
- Authenticate use, detect fraud or abuse, protect systems and users, investigate incidents, and enforce applicable terms.
- De-identify or aggregate information for analytics, reporting, planning, quality improvement, and other lawful purposes.
- Comply with law, legal process, regulatory obligations, contracts, audits, recordkeeping requirements, and other purposes disclosed when information is collected or with your consent.

6. How we disclose information

- Affiliates and related health care organizations. We may share information with Millennium Physician Group and other affiliated entities for legitimate business, administrative, operational, or health care purposes, subject to applicable law and the NPP when PHI is involved.
- Vendors and service providers. We may share information with providers that support hosting, cloud infrastructure, CRM and lead management, communications, analytics, advertising measurement, security, translation, mapping, social integrations, customer support, records requests, payment services, patient portals, careers, and other operational functions.
- Authorized internal teams. We may make information available to IMA Patient Outreach, Community Partnership, Patient Engagement, clinic, grievance, or other authorized teams when needed to respond or route a request.
- At your request or direction. We may share information with a health care provider, family member, caregiver, or other person you designate, or with a service you choose to use.
- **Analytics and advertising measurement providers.** Depending on the page context, we may disclose limited Website-event information under the applicable approved configuration described in Section 4. We do not authorize disclosure of PHI or Website-form values to these providers for their own targeted advertising.
- Legal, compliance, safety, and business transactions. We may disclose information when required or permitted by law, to protect rights or safety, to respond to legal or regulatory process, or in connection with a merger, acquisition, restructuring, financing, or similar transaction subject to applicable obligations.
- De-identified or aggregated information. We may disclose information that has been processed so that it cannot reasonably be used to identify an individual, as permitted by applicable law.

Mobile and messaging information

IMA does not sell mobile telephone numbers, text-message opt-in data, or communication-consent records, and does not disclose them to third parties for the third parties' own marketing or promotional purposes. Service providers may process such information only to support IMA communications or another permitted service.

7. Communications and consent

The disclosure and choices displayed on a specific form control the communication you are requesting. Submitting a Become a Patient or AEP form may authorize IMA to respond by manual telephone call or e-mail

when the form says so. It does not, by itself, authorize unrelated future promotional messages, recurring marketing texts, or automated or prerecorded telemarketing calls.

- Requested follow-up. We may contact you by the channels described at the point of collection to respond to your request and discuss becoming a patient.
- Promotional e-mail. Where offered, a future promotional e-mail subscription is separate and optional. You may unsubscribe using the link in the message.
- Text messages and automated calls. IMA will present separate channel-specific language and obtain any legally required consent before using recurring marketing texts or automated or prerecorded telemarketing calls.
- Text messaging Consent and Opt-Out. If you consent to receive text messages from IMA (such as appointment reminders, prospective-patient outreach, or service updates), message and data rates may apply. You can opt out of receiving text messages at any time by replying STOP to any message you receive from us. For help, reply HELP or contact us using the details below. Opting out of marketing or informational texts will not prevent critical care-related notifications sent through approved patient communications channels.
- Preferences and suppression. You may ask IMA to update communication preferences. We may retain limited suppression information needed to honor an opt-out or do-not-contact request.

8. Your choices and privacy requests

- **Cookies and browser controls**. Most browsers let you restrict or delete cookies. Where IMA provides a Website preference tool, you may also use that tool.
- **Advertising choices.** The approved AEP program does not use retargeting or remarketing. Where other approved advertising technologies or Website preference controls provide choices, you may use those controls and applicable industry opt-out tools.
- **E-mail**. You may opt out of promotional e-mail using the unsubscribe mechanism in the message. This does not prevent service, transactional, legal, or care-related communications that are otherwise permitted.
- **Telephone and other preferences**. Contact IMA or the Privacy Office to request an update to communication preferences or to ask that promotional contact stop.
- **Access, correction, or deletion**. You may request access to, correction of, or deletion of Personal Information collected through the public Website, subject to applicable law, verification, security, and recordkeeping obligations. Some information may not be eligible for deletion.
- **Medical records and HIPAA rights**. Requests concerning medical records, PHI, or HIPAA rights must be handled under the NPP and IMA's patient-rights processes.

State privacy rights and browser signals

Depending on where you live, applicable law may provide additional rights regarding Personal Information. Some privacy laws exempt PHI, health care information, or entities regulated by HIPAA. We will evaluate a verified request and respond as required by applicable law. Some browsers transmit Do Not Track or opt-out preference signals. Because standards are not uniform, the Website may not respond to every signal, but IMA will honor legally required signals where applicable and technically supported.

To the extent IMA collects Personal Information through the public Website that is subject to applicable state privacy legislation, eligible residents may have the following rights:

- **Right to Access / Know:** Request confirmation of whether we process your Personal Information and request access to or a copy of the specific pieces of Personal Information we have collected about you in a portable, readily usable format.
- **Right to Correction:** Request that we correct inaccuracies in your Personal Information, taking into account its nature and the purpose of processing.
- **Right to Deletion:** Request the deletion of Personal Information provided by or collected about you, subject to statutory retention, legal, and operational exceptions.
- **Right to Opt-Out of Sale, Sharing, or Targeted Advertising:** Request to opt out of the "sale" of your Personal Information, sharing for cross-context behavioral advertising, or targeted advertising. *Note: IMA does not sell Personal Information or share website activity with third parties for cross-context targeted advertising under our PHI-Free Tracking configuration.*
- **Right to Non-Discrimination:** Exercise any of your privacy rights without receiving discriminatory treatment or a denial of Website services.

Submitting a Request or Appeal. To exercise any applicable state privacy right, please submit a request to the Privacy Office using the contact details in Section 13. We will verify your identity before processing your request using standard security procedures. Authorized agents submitting requests on behalf of an eligible consumer must provide written proof of authorization. If we decline to take action regarding your request, we will inform you of our decision and the legal reason for it. If your state provides a right to appeal, you may appeal our decision within 30 days by writing to our Privacy Office with the subject line "Privacy Request Appeal". If your appeal is denied, you may have the right to contact your state Attorney General.

9. Retention

We retain Personal Information for as long as reasonably necessary for the purposes described in this policy, including to respond to requests, manage leads and communications, honor preferences, maintain security and audit records, comply with legal and contractual obligations, resolve disputes, and enforce agreements. Retention periods may vary by information type, system, and business purpose. If information becomes part of a patient record or another regulated record, the applicable legal, clinical, records-management, and NPP requirements govern retention and disposition.

10. Children's privacy

The public Website is intended primarily for adults, patients, prospective patients, family members, caregivers, brokers, and other users seeking IMA information and services. We do not knowingly collect Personal Information directly from children under 13 through general public Website forms without appropriate involvement of a parent or legal guardian, except where collection is otherwise permitted by law. A parent or legal guardian may use the Website on behalf of a minor. PHI involving a minor is governed by the NPP and applicable federal and state law.

11. Data security

IMA uses administrative, technical, and physical safeguards designed to reduce the risk of accidental, unauthorized, unlawful, or improper access, alteration, disclosure, destruction, or use of information. Safeguards

may include access restrictions, secure transmission, encryption, logging, monitoring, vendor controls, and other measures appropriate to the information and system involved.

No Internet transmission or electronic storage method is completely secure, and we cannot guarantee absolute security. Do not use a general public Website form to send emergency information, detailed clinical information, account credentials, or other information that the form does not request. If you believe information submitted through the Website may have been compromised, contact the Privacy Office using the information below.

12. Changes to this policy

We may update this policy to reflect changes in the Website, data practices, technologies, vendors, legal requirements, or organizational structure. We will post the updated policy on the Website and update the effective or revision date. If a change materially affects how we use Personal Information, we may provide additional notice where appropriate or required by law.

13. Contact us

Questions, concerns, complaints, or requests about this policy or IMA's public Website privacy practices may be directed to:

Privacy Office	Mosaic Health / MPG / IMA Medical Group Privacy Office
Telephone	(855) 517-8676
E-mail	Privacy@mosaichealth.com
Website	www.imamedicalgroup.com