

NOTICE OF PRIVACY PRACTICES

AND NOTICE OF ORGANIZED HEALTH CARE ARRANGEMENT

Effective Date: February 16, 2026

YOUR INFORMATION. YOUR RIGHTS. OUR RESPONSIBILITIES.

This Notice describes how health information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

I. ORGANIZED HEALTH CARE ARRANGEMENT (OHCA)

GuideWell-Sanitas I, LLC together with its Florida healthcare clinics (“Sanitas”), Florida Behavioral Center, Inc., and GuideWell Emergency Medicine Doctors, LLC participate in an Organized Health Care Arrangement (“OHCA”) and jointly provide and coordinate various clinical and operational activities to improve the health and wellbeing of their patients residing in the markets they serve (“Joint Activities”).

Sanitas and the other OHCA participants will share your Protected Health Information (defined below) related to the Joint Activities of the OHCA, consistent with each other’s Notice of Privacy Practices and as permitted by the regulations issued under the Health Insurance Portability and Accountability Act (“HIPAA”). The OHCA participants agree to abide by the terms of this Notice with respect to Protected Health Information created or received through participation in the OHCA.

The purpose of the OHCA is solely for compliance with HIPAA and creates no legal representations, warranties, obligations or responsibilities beyond HIPAA compliance. Nothing contained in this Notice is intended to suggest that any OHCA participants are agents of the other participants or that participants are liable for the acts or omissions of other participants.

II. APPLICABILITY OF NOTICE

Certain information contained your medical record is referred to as Protected Health Information (“PHI”). PHI may include your name, address, and other identifying data, as well as information about your health and the health services that you may receive or have already received. This Notice describes the privacy practices of Sanitas and pertains to all providers, clinical staff, employees, staff, independent contractors,

vendors, volunteers and agents of Sanitas. It applies to all PHI about you that is maintained by Sanitas, including any such information that is maintained on paper, electronically, or verbally spoken. This Notice describes how Sanitas may use and disclose the information that has been collected and what rights you have with respect to your medical information.

Certain records related to substance use disorder diagnosis, treatment, or referral are subject to additional federal protections as described below.

III. OUR RESPONSIBILITIES

Sanitas (“we” or “our”) is committed to maintaining the privacy and confidentiality of your health information. We are required by law to maintain the privacy and security of your protected health information. We will let you know promptly if a breach occurs that may have compromised the privacy and security of your health information. We must follow the duties and privacy practices described in this Notice and give you a copy of it. We will not use or share your information other than as described in this Notice unless you tell us we can in writing. If you tell us we can, you may change your mind at any time. Please let us know in writing if you change your mind.

This Notice informs you how we may use and disclose health information about you for purposes described in this Notice. As required by the HIPAA Privacy Rule, we must establish policies and procedures for safeguarding PHI received, created, transmitted or maintained. You will be asked to sign an acknowledgement that you have received this Notice.

For more information, please visit:

www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/noticepp.html

IV. YOUR RIGHTS

- ***When it comes to your health information, you have certain rights.*** This section explains your rights and some of our responsibilities to you.
- **Get an Electronic or Paper Copy of Your Medical Record.** You can ask to see or get an electronic or paper copy of your medical record Obtain a paper copy of this Notice

and other health information we have about you. Ask us how to do this. We will provide a copy or a summary of your health information, usually within 30 days of your request. We may charge a reasonable, cost-based fee.

Ask Us to Correct Your Medical Record. You can ask us to correct health information about you that you think is incorrect or incomplete. Ask us how to do this. We may say “no” to your request, but we’ll tell you why in writing within sixty (60) days.

Request Confidential Communications. You can ask us to contact you in a specific way (for example, home or office phone) or to send mail to a different address. We will say “yes” to all reasonable requests.

Ask Us to Limit What We Use or Share. You can ask us not to use or share certain health information for treatment, payment or healthcare operations; we are not required to agree to your request, and we may say “no” if it would affect your care. If you pay for a service or healthcare item out-of-pocket in full, you can ask us not to share that information for the purpose of payment or our operations with your health insurer; we will say “yes” unless a law requires us to share that information.

Get a List of Those with Whom We’ve Shared Information. You can ask for a list (an “accounting”) of the times we’ve shared your health information for six (6) years prior to the date you ask, who we shared it with, and why. We will include all the disclosures except for those about treatment, payment, and health care operations, and certain other disclosures (such as any you asked us to make). We’ll provide one (1) accounting a year for free but will charge a reasonable, cost-based fee if you ask for another one within twelve (12) months.

Get a Copy of this Privacy Notice. You can ask for a paper copy of this Notice at any time, even if you have agreed to receive the Notice electronically. We will provide you with a paper copy promptly.

Choose Someone to Act for You. If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health information. We will make sure the person has this authority and can act for you before we take any action.

File a Complaint if You Feel Your Rights are Violated. You can file a complaint if you feel we have violated your rights by contacting any of the following:

Sanitas

Attention: Privacy Officer
8400 NW 33rd Street, Suite 201
Doral, FL 33122 Privacy
Email: patientprivacy@mysanitas.com

U.S. Department of Health and Human Services

200 Independence Avenue, S.W.
Washington, D.C. 20201 1-877-696-6775
www.hhs.gov/ocr/privacy/hipaa/complaints

We will not retaliate against you for filing a complaint.

V. YOUR CHOICES

For certain health information, you can tell us your choices about what we share. If you have a clear preference for how we share your information in the situations described below, talk to us. Tell us what you want us to do, and we will follow your instructions.

You Have Both the Right and Choice to Tell Us to share information with your family, close friends or others involved in your care; share information in a disaster relief situation; or include your information in a hospital directory (if applicable). *If you are unable to tell us your preference (i.e., you are unconscious), we may go ahead and share your information if we believe it is in your best interest. We may also share your information when needed to lessen a serious and imminent threat to health or safety.*

We Never Share Your Information Unless You Give Us Written Permission for (1) uses and disclosures of psychotherapy notes; (2) uses and disclosures of Health Information for marketing purposes; (3) uses and disclosures of Health Information where Sanitas receives payment in exchange for disclosing such Health Information; and (4) any other uses and disclosures of Health Information not described in this Notice.

VI. HOW SANITAS MAY USE AND DISCLOSE YOUR HEALTH INFORMATION

How Do We Typically Use or Share Your Health Information? We typically use or share your health information in the following ways.

Treatment. We can use your health information and share it with other healthcare professionals who are treating you or involved with your care. We may disclose your health information to doctors, nurses, medical assistants or other individuals at Sanitas who need the information to care for you. We may also disclose your health information to individuals outside of Sanitas who may be involved in your care, such as treating doctors, home care providers, pharmacies and family members.

Healthcare Operations. We can use and share your health information to run our organization and improve the quality of patient care. We may also combine health information about several patients to identify new services to offer, what services are not needed and whether certain treatments are effective. We may also disclose information to doctors, nurses, medical assistants and other individuals at Sanitas for learning and quality improvement purposes. We may remove information that identifies you so individuals outside of Sanitas can study your health data with anonymity.

Payment. We can use and share your health information to bill and get payment from health plans and other entities. We may also tell your health plan about the treatment you are going to receive so we can get prior payment approval or learn if your plan will pay for the treatment

Healthcare Messages (Reminders, Treatment Alternatives and Health-related Benefits and Services). We may use and disclose your health information to contact you about an upcoming appointment or medication refill. We may use and disclose your health information to advise you of treatment options or alternatives or health-related benefits and services that may be of interest to you. We may also make your health information available for you to access through a secure online portal or the mySanitas mobile application. We may contact you by mail, telephone or email.

Joint Activities under the OHCA. We may share your PHI with other OHCA participants, to be used as necessary to carry out Joint Activities, including treatment, payment or healthcare operations related to the OHCA.

Health Information Exchange. We participate in certain health information exchanges that share health information electronically with other health providers and organizations for treatment, payment and healthcare operations purposes, as permitted by relevant state and federal law. Additionally, we may access your health information maintained by other providers, health information exchange networks and health plans for our treatment, payment or healthcare operations purposes. If you do not wish to participate in the health information exchange, you may “opt-out” at any time by notifying Sanitas in writing.

How Else Can We Use or Share Your Health Information? We are allowed or required to share your information in other ways – usually in ways that contribute to the public good, such as public health and research. We must meet many conditions under applicable law before we can share your information for these purposes. For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/index.html.

Health-Related Services. We may use and disclose your health information to send you communications about health-related products and services available at Sanitas.

Public Health and Safety Issues. We can share your health information in certain situations such as preventing disease; disaster relief; helping with product recalls; reporting adverse reactions to medications; reporting suspected abuse (i.e., child, adult, domestic), neglect or domestic violence; or preventing or reducing a serious threat to anyone's health or safety.

Research. We can use or share your information for health research.

Required by Law. We will share your health information if required by state or federal laws, including the Department of Health and Human Services if it wants to see that we're complying with federal privacy law.

Organ and Tissue Donation Requests. We can share your health information with organ procurement organizations.

Medical Examiner or Funeral Director. We can share health information with a coroner, medical examiner or funeral director upon the death of an individual.

Workers' Compensation, Law Enforcement and Other Government Requests. We can use or share health information about you: for workers' compensation claims; for law enforcement purposes or with a law enforcement official; with health oversight agencies for activities authorized by law; for special government functions such as military, national security and presidential protective services.

Lawsuits and Legal Actions. We can share health information about you in response to a court or administrative order, or in response to a subpoena.

Authorizations for Other Uses and Disclosures. As described in this Notice, we may use your health information and disclose it outside of Sanitas for treatment, payment, healthcare operations and when required or permitted by law. We will not use or share your health information for other reasons (i.e., psychotherapy notes) without your written authorization. The authorization may be revoked at any time, but any information shared prior to the revocation would not be impacted.

Business Associates. We may disclose health information to our business associates who perform functions or provide services on our behalf, if the information is necessary for such functions or services. Our business associates are obligated by law and pursuant to a written agreement, to protect the privacy of health information and are not allowed to use or disclose any information other than as specified in the agreement.

HIV Test Results. We may use and disclose HIV test results only if you give your permission to use and disclose these HIV test results along with your medical records at the time of testing. If you did not give such permission, we may use and disclose this information only for the following limited purposes without your written authorization: (1) for health care treatment (as described above) and to provide you with health care services, such as informing a specialist about your HIV status to enable the specialist to provide additional services to you; (2) for payment (as described above), such as compiling or reviewing records as part of routine billing; (3) for health care operations (as described above), such as to enable our health facility staff to monitor and evaluate our programs; (4) to child-placing or child-caring agencies, family foster homes, residential facilities or community-based care programs that are directly involved in placement, care, control or custody and who have a need to know such information; (5) to a sex or needle sharing partner in accordance with applicable law; (6) to the Florida Department of Health for public health reporting and disease control purposes, in accordance with applicable law; (6) to organizations that procure, process, distribute or use organs, eyes, or tissues for donation purposes; (7) to authorized medical or epidemiological researchers; (8) in accordance with a valid court order that specifically requires us to release HIV test results; (9) if an officer, law enforcement personnel, firefighter, ambulance driver, paramedic or emergency medical technician comes into contact with a person in such a way that significant exposure to HIV has occurred, then we may release such HIV test results to a person who was significantly exposed to HIV.

Psychotherapy Notes. Separate authorizations are generally required for most uses and disclosures of psychotherapy notes. We may use and disclose notes taken during psychotherapy counseling that you received from Sanitas only for the following limited purposes: (1) for health care treatment (as described above) and to provide you with health care services, such as a physician reviewing his/her notes prior to your therapy session; (2) to defend Sanitas in a legal action or other proceeding, such as providing psychotherapy notes to our lawyers who are defending Sanitas in a legal case; (3) when required by law (as described above) under international, federal, state or local law; (4) to a health oversight agency for oversight activities involving the creator of the notes (as described above); (5) to identify you to a coroner or medical examiner (as described above); (6) when necessary to prevent or lessen a serious threat to health and safety (as described above).

VII. SPECIAL PROTECTIONS FOR SUBSTANCE USE DISORDER (SUD) RECORDS

Sanitas provides services that may include diagnosis, treatment, or referral for substance use disorders (“SUD”). Records relating to SUD services may be protected by federal law under 42 CFR Part 2.

Additional Confidentiality Protections. SUD records are subject to enhanced confidentiality protections. We may use and disclose SUD records for treatment, payment, and healthcare operations consistent with HIPAA and Part 2 requirements.

Prohibition on Use in Legal Proceedings. SUD records may not be used or disclosed in civil, criminal, administrative, or legislative proceedings without your specific written authorization or a court order that meets Part 2 requirements.

Redisclosure. Recipients of SUD records disclosed pursuant to valid authorization or as permitted by law may further use or disclose such information as permitted by HIPAA and Part 2. Unauthorized redisclosure is prohibited.

Anti-Discrimination Protections. Federal law prohibits discrimination against individuals based on information relating to substance use disorder diagnosis or treatment.

Complaints Regarding SUD Records. You may file a complaint regarding the misuse of SUD records with:

Sanitas

Attention: Privacy Officer
8400 NW 33rd Street, Suite 201
Doral, FL 33122 Privacy
Email: patientprivacy@mysanitas.com

or

U.S. Department of Health and Human Services
Office for Civil Rights
www.hhs.gov/ocr/privacy/hipaa/complaints/

We will not retaliate against you for filing a complaint.

VIII. AUTHORIZATIONS

We will obtain your written authorization before:

- Using or disclosing psychotherapy notes (except as permitted by law)
- Using or disclosing PHI for marketing where required
- Selling your PHI
- Using or disclosing SUD records in circumstances requiring authorization under 42 CFR Part 2

You may revoke your authorization in writing at any time.

IX. CHANGES TO THIS NOTICE

We reserve the right to change the terms of this Notice, and the changes will apply to all information we have about you. We reserve the right to make the revised or changed notice effective for health information we already have as well as for any information we receive in the future. We will post a copy of the current notice at our facilities and locations. The Notice will be effective on the date specified on the first page. The new notice will be available on request, in our offices and facilities, on www.mysanitas.com and on the mySanitas mobile application.

X. CONTACT INFORMATION

Medical Records Request. To maintain patient confidentiality and assure compliance with federal and state privacy laws, health information may not be released without your written authorization (except as permitted by law). To request your health records, you will need to download, complete and sign a Medical Records Release form. The form may be accessed by visiting <https://www.mysanitas.com/en/resources#tab-72> and clicking on Patient Forms.

Send to:

Sanitas Medical Center, Attention: HIM Department, 8400 NW 33rd Street, #201, Doral, FL 33122 or via fax to 305-402-0855. Alternatively, you may obtain your medical records by using the mySanitas mobile application.

Request an Amendment, Accounting of Disclosures, Restrictions, Confidential Communications or a Paper Copy of this Notice. The written request should be sent to Sanitas Medical Center, Attention: HIM Department, 8400 NW 33rd Street, #201, Doral, FL 33122 or via fax to 305-402-0855.

Patient Privacy Questions, Concerns and Complaints. Your privacy is important to us. If you have a question, concern, complaint or you wish to exercise your rights described in this Notice, please contact the Privacy Officer at: Sanitas Medical Center, Attention: Privacy Officer, 8400 NW 33rd Street, #201, Doral, FL 33122, the Sanitas Patient Privacy email at patientprivacy@mysanitas.com. Most requests to exercise your rights must be made in writing to the Privacy Officer. Please include your full name, contact number and a brief description of your question, concern or complaint.