



Notice of Privacy Practices

HIPAA Privacy Statement

Corventis Inc. (Corventis) is a developer of medical equipment and IDTF services. Corventis collects patient health, billing and insurance data from individuals. We are committed to providing you with the highest quality of care. An essential part of this commitment is our dedication to protecting the privacy and the confidentiality of your medical information.

THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Notice of Privacy Practices

The Health Insurance Portability and Accountability Act of 1996, HIPAA, and the new regulations, effective April 14, 2003, set forth certain legal requirements regarding how healthcare providers must protect your medical information. Corventis is required by law to maintain the privacy of certain confidential health care information, known as **Protected Health Information** or **PHI**, and to provide you with a notice of our legal duties and privacy practices with respect to your PHI. Corventis is also required to abide by the terms of the version of this Notice currently in effect. This notice also discusses your rights as a patient under the law.

Uses and Disclosures

Corventis may use PHI for the purposes of treatment, payment, and health care operations, in most cases without your written permission.

For treatment: We may use your PHI to provide treatment or services to you. We may disclose your PHI to healthcare professionals such as, doctors, nurses, and technicians who are involved in taking care of you. We may also provide your physician or a subsequent healthcare provider with copies of various reports that should assist him or her in treating you. Corventis also provides access to on-line information for your physician or healthcare provider.

For payment: We may use and disclose medical information about your treatment and services to bill and collect payment from you, your insurance company, health plan or another third party payer.

For health care operations: We will also use your PHI to assist in running our operations. Members of the medical staff and development team may use information in your health record to assess the care and outcomes in your case and others like it. The results will then be used to continually improve the quality of care for all patients we serve. For example, we may combine medical information about many patients to evaluate the need for new services or treatment or to improve existing services or treatments. We may remove information that identifies you from this set of medical information to protect your privacy.

Other Uses and Disclosures: Corventis is permitted to use and disclose your information when permitted or required by law.

- To a family member, other relative, or close personal friend or other individual involved in your care if we obtain your verbal agreement to do so or if we give you an opportunity to object to such a disclosure and you do not raise an objection, and in certain other circumstances where we are unable to obtain your agreement and believe the disclosure is in your best interests;
- To a public health authority in certain situations as required by law (such as to report abuse, neglect or domestic violence);
- For health oversight activities including audits or government investigations, inspections, disciplinary proceedings, and other administrative or judicial actions undertaken by the government (or their contractors) by law to oversee the health care system;
- For judicial and administrative proceedings as required by a court or administrative order, or in some cases in response to a subpoena or other legal process;
- For law enforcement activities in limited situations, such as when responding to a warrant;
- For military, national defense and security and other special government functions;
- To avert a serious threat to the health and safety of a person or the public at large;
- For workers' compensation purposes, and in compliance with workers' compensation laws;
- To coroners, medical examiners, and funeral directors for identifying a deceased person, determining cause of death, or carrying on their duties as authorized by law;
- If you are an organ donor, we may release health information to organizations that handle organ procurement or organ, eye or tissue transplantation or to an organ donation bank, as necessary to facilitate organ donation and transplantation;
- For research projects, but this will be subject to strict oversight and approvals;
- We may also use or disclose health information about you in a way that does not personally identify you or reveal who you are.
- To Business Associates; there are some services provided in our organization through contract with business associates. When these services are contracted, we may disclose your health information to our business associate so that they can perform the job we've asked them to do. So that your health information is protected, however, we require the business associate to

appropriately safeguard your information. Examples include customer service and third party billing.

- To the Food and Drug Administration (FDA); we may disclose to the FDA health information relative to adverse events with respect to audits, or post marketing surveillance information to enable product recalls, repairs or replacement and FDA audits.

Any other use or disclosure of PHI, other than those listed above will only be made with your written authorization. You may revoke your authorization at any time, in writing, except to the extent that we have already used or disclosed medical information in reliance on that authorization.

Federal law makes provision for your health information to be released to an appropriate health oversight agency, public health authority or attorney, provided that a workforce member or business associate believes in good faith that we have engaged in unlawful conduct or have otherwise violated professional or clinical standards and are potentially endangering one or more patients, workers or the public.

Patient Rights:

As a patient, you have a number of rights with respect to your PHI, including:

The right to access copy or inspect your PHI: This means you may inspect and copy most of the medical information about you that we maintain. We will normally provide you with access to information within 30 days of your request. We may also charge you a reasonable fee for you to copy any medical information that you have requested. In limited circumstances, we may deny access to your medical information. We will provide a written response if we deny access and let you know your appeal rights. You also have the right to receive confidential communications of your PHI. If you wish to inspect and copy your medical information, you should first contact your healthcare provider. You may subsequently contact our Privacy Officer.

The right to amend your PHI: You have the right to ask us to amend medical information that we may have about you. We will generally amend your information 60 days from your request and will notify you when we have amended the information. We are permitted by law to deny your request to amend your medical information only in certain circumstances. If you wish to request that we amend the medical information that we have about you, you should first contact your healthcare provider. Corventis may be contacted directly by visiting www.corventis.com and completing the Request for Amendment of Health Information form.

The right to request an accounting: You may request an accounting of certain disclosures of your medical information that we have made in the six years prior to the date of your request. We are not required to give you an accounting of information we have used or disclosed for purposes of treatment, payment or health care operations, or when we share your health information with our business associates with which we have agreements in place such as billing services and customer service. We are

also not required to give you an accounting of our uses of PHI for which you have already given us written authorization. If you wish to request an accounting, contact our privacy officer.

The right to request that we restrict the uses and disclosures of your PHI: You have the right to request that we restrict how we use and disclose your medical information that we have about you. You may also revoke previous authorizations except to the extent that action has already been taken.

Right to Obtain Copy of Privacy Notice on Request: You will find a copy of this notice at www.corventis.com. Upon request, we will forward you this notice by electronic mail, paper mail, or fax.

Right to alternative media: You may request communications of your health information by alternative means or at alternative locations.

Your Legal Rights and Complaints: You also have the right to complain to us, or to the Secretary of the United States Department of Health and Human Services if you believe your privacy rights have been violated. You will not be retaliated against in any way for filing a complaint with us or to the government. Should you have any questions, comments or complaints you may direct all inquiries to our privacy officer.

The following forms are available on-line at www.corventis.com or by request by contacting our privacy officer:

- Individual Request for Access to Records Form
- Request for Accounting of Disclosure of Protected Health Information Form
- Request for Amendment of Health Information Form

Corventis Authorization Process

We will not use or disclose your health information without your authorization, except as described in this notice. Other uses or disclosures will only be conducted with a valid authorization from you or your legal representative. Authorization will be obtained via the Authorization for use and Disclosure of Information form. This form is available to you on our website, www.corventis.com. Authorization may be revoked at anytime by contacting Corventis in writing. See contact information below.

Corventis Responsibilities

Personal Designations: Corventis is responsible for designating in writing an individual who is responsible for ensuring policies and procedures have been developed and implemented. Corventis must also designate an individual to receive and handle complaints. You may reach this designated individual at the contact information below.

Training: Corventis must also ensure that the Corventis workforce is trained on the HIPAA policies and procedures and that the training is documented.

Safeguards: Corventis must have appropriate administrative, physical and technical safeguards to protect the privacy of PHI.

Complaints: Corventis must provide a process for individuals to make complaints regarding our policies and procedures. See contact information below for complaint contact information.

Sanctions: Corventis must have and apply appropriate sanctions against members of its workforce who fail to comply with our policies and procedures. Corventis must document any sanctions that are applied.

Mitigation: Corventis must mitigate, to the extent practical, any harmful effect of a known use or disclosure violation of PHI by Corventis or a Business Associate.

Refrain from Intimidating or Retaliatory Acts: Corventis may not intimidate, threaten, coerce, discriminate against or take retaliatory action against any individual or employee for exercising any HIPAA rights, whistle blowing, complaint filing, testifying, etc with regards to a HIPAA violation.

Waiver of Rights: Corventis may not require individuals to waive their rights with regards to HIPAA as a condition of treatment, payment, or enrollment.

Policies and Procedures: Corventis must implement policies and procedures with respect to PHI that are compliant with the standards of HIPAA.

Documentation: Corventis must maintain policies and procedures; communications; actions and activities for a record retention period of six years from the date of creation or the date it was last in effect, whichever is greater.

For More Information or to Report a Problem

The first step for obtaining information regarding your PHI is to contact your healthcare provider. When it is not possible or practical, Corventis may be contacted directly for information or to report a problem at the contact information below.

Privacy Officer
Corventis, Inc
1410 Energy Park Drive
Suite 1
St. Paul, MN 55108
User Assistance Number: 1-408-790-9399
PrivacyOfficer@corventis.com

Effective Date:

May 1, 2009

Revisions to Notice

Corventis reserves the right to change the terms of this Notice at any time, and the changes will be effective immediately and will apply to all PHI that we maintain. Any material changes to the Privacy Notice will be promptly posted on our web site. You can get a copy of the latest version of this Notice by contacting our privacy officer.