

## **Town Square Health Privacy Policy**

**Last Updated/Effective Date: 7/31/2026**

Town Square Health, Inc. (“**Town Square,**” “**we,**” “**our,**” or “**us**”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and protect information through our website, digital platforms, and communication tools (collectively the “**Services**”).

This Privacy Policy applies to all visitors, patients, prospective patients, and business partners who interact with our Services. It covers non-PHI information collected online and through administrative workflows.

***This Privacy Policy does not govern Protected Health Information (PHI) collected in the course of providing medical care. PHI is governed exclusively by our Notice of Privacy Practices (NPP), issued by the clinical entity (the PC). The NPP is available on our website and in our offices.***

### **1. Entities Covered by This Policy (MSO/PC Structure)**

Town Square operates through a clinical entity (the Professional Corporation, or PC) and an administrative entity (the Management Services Organization, or MSO).

- The PC is the HIPAA-covered entity responsible for medical care and PHI.
- The MSO provides administrative, operational, and business support, including website management, scheduling tools, SMS communications, and analytics.

*This Privacy Policy applies to both entities for non-PHI data collected through the Services. PHI is governed solely by the PC’s Notice of Privacy Practices.*

### **2. What Is Personal Information**

For purposes of this Privacy Policy, “Personal Information” means information that alone or in combination identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal Information does not include publicly available information or aggregated information that does not include personal identifiers.

### **3. Sources of Personal Information**

We obtain the categories of Personal Information listed above from the following categories of sources:

#### **A. Information You Provide Directly**

We may collect information you voluntarily provide through forms, scheduling tools, SMS, or business inquiries, including:

- Name
- Email address
- Phone number
- Mailing address
- Demographic information
- Insurance or payer information (non-PHI)
- Business or partnership inquiries
- Information submitted through SMS or online chat

*If you submit medical or health-related information through our Services, we treat it as PHI and handle it under our Notice of Privacy Practices.*

## **B. Information Collected Automatically**

When you use our Services, we may automatically collect:

- IP address
- Device and browser type
- Operating system
- Pages visited
- Time spent on the site
- Referring URLs
- General location information
- Cookie and tracking data

This information supports the functionality, analytics, and security of the Services.

## **C. Information Collected from Third Parties**

We may receive Personal Information about you from third parties, depending on how you engage with us and the services we provide. These third-party sources may include:

- Business partners and clients, such as payors, health systems, life sciences organizations, or other entities that engage us to provide clinical or advisory services. These organizations may share information needed for us to perform those services.

- Service providers and vendors — including organizations that support our operations, such as analytics providers, credentialing services, payment processors, or communications platforms.
- Affiliates — entities under common ownership or control that support our business activities.
- Publicly available sources — such as professional directories, licensing boards, publications, or other public records used to verify credentials or supplement information.
- Social networks or digital platforms — when you interact with our content or choose to connect your account or profile to our Services, subject to your settings and the platform’s privacy practices.

#### **4. How We Use Your Information**

We use Personal Information for purposes that are consistent with the context in which it was collected and with applicable laws. These purposes may include:

- Providing and supporting our services.
- Communicating with you, such as responding to inquiries, scheduling services, or sending information you request.
- Operating, maintaining, and improving our Services and digital platforms, including analytics, security, troubleshooting, and user experience enhancements.
- Conducting administrative, business, and contractual functions, such as credentialing, payment processing, or verifying professional information.
- Sending informational or marketing communications, where permitted by law and your preferences.
- Complying with legal, regulatory, and contractual obligations.
- Protecting the security and integrity of our systems, preventing fraud, and enforcing our policies.
- Any purpose disclosed at the time of collection, or for which you provide consent.

*PHI is used only as described in our Notice of Privacy Practices.*

#### **5. How We Share Information**

We may share Personal Information with third parties when necessary to operate our business, provide our services, or comply with legal and contractual obligations. The categories of third parties with whom we may share Personal Information include:

- Website hosting and IT service providers
- SMS and communication platforms
- Scheduling and engagement tools

- Analytics vendors
- Business partners supporting MSO functions
- Legal or regulatory authorities when required
- Security and fraud-prevention partners

*PHI is shared only as permitted under HIPAA and described in our Notice of Privacy Practices.*

## **6. Data Retention**

We retain Personal Information for as long as necessary to fulfill the purposes for which it was collected, to comply with legal, regulatory, and contractual requirements, and to support our business operations. Retention periods may vary depending on the type of information, the nature of the services provided, and applicable laws or agreements. In some cases, we may retain information for longer periods if required or permitted by law.

## **7. Data Security**

We use administrative, technical, and physical safeguards designed to protect Personal Information from unauthorized access, disclosure, alteration, or destruction. While we strive to protect the information we maintain, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee absolute security.

We take steps to help ensure that the Personal Information we process is relevant to its intended use and is maintained in a manner that is accurate and, where necessary, kept up to date. The level of accuracy depends in part on the information you provide, and we encourage you to notify us of any changes to your information.

## **8. De-Identified/Aggregated Data**

We may aggregate or de-identify Personal Information we collect through our Services and when operating our business. Once information or data has been de-identified and/or aggregated, such information is no longer Personal Information. We may use or share such de-identified or aggregated data for any legal purpose at our sole discretion.

## **9. Site Analytics, Cookies, and Other Tracking Technology**

We use analytics services and targeted advertising cookies in addition to location features that are connected to your use of the Services. We use cookies, web beacons, pixel tags, and other technologies (collectively, "Cookies") on our Services to automatically collect information that helps us improve the Services and advertise to you. A cookie is a small text file that our Services save onto your computer or device when you use the Services.

A cookie can either be a "session" cookie or a "persistent" cookie. Session cookies exist only for so long as you are visiting the website and are typically deleted when you exit your web browser.

Each time you visit a website that has implemented a persistent cookie, the cookie is renewed, and it will remain active until its predetermined expiration date.

#### A. Website Analytics

We use third-party software tools on our Services to learn more about how visitors navigate the Services and view content. These third-party analytics providers provide us with analytical information collected through Cookies that we use to improve the Services, make sure they are easy to use, and develop content that is both interesting and customized.

- **Piwik PRO Analytics:** We have enabled Piwik PRO Tag Manager and Piwik PRO Analytics to understand how visitors use our website and to improve user experience, performance, and communication. These tools may collect information such as device type, browser type, pages visited, time spent on the site, and general location information. You can learn more about Piwik's practices with respect to Personal Information by reviewing their privacy policy, available at [Privacy policy - Piwik PRO](#).
- **HubSpot Analytics:** We use HubSpot Analytics, a web analytics tool, to help us understand how our website is used. HubSpot Analytics utilizes various tracking technologies to generate the information we select about your use of our Services, which may include information about the Website or online services visited before a device accesses our Services, metrics about the performance of our Services, and information about how devices access our Services. You can learn more about HubSpot's practices with respect to Personal Information by reviewing their privacy policy, available at HubSpot's [Privacy Policy](#).

#### B. Website Security

- **Google reCAPTCHA:** We use Google reCAPTCHA to protect our website and Services from spam and abuse. reCAPTCHA collects information about your interaction with our Services, including device and application data, browser and usage information. This information is transmitted to and processed by Google for the purpose of verifying that activity on our Services is performed by a human and not automated software. Google may process this information on servers located outside your region, including in the United States and the European Union. The data collected through reCAPTCHA is used solely for security purposes and is not used by us for marketing. For more information on Google's data practices, please review [Google's Privacy Policy](#).

### 10. Your Privacy Choices

- **Update Your Personal Information.** You may update your Personal Information by contacting us using the information in the "Contact Us" section below or by contacting us at [privacy@townsquarehealth.com](mailto:privacy@townsquarehealth.com).

- **Delete Your Account.** If you no longer wish to use the Services or access your account or account information, you may request us to delete your account by contacting us at [privacy@townsquarehealth.com](mailto:privacy@townsquarehealth.com). This will result in the full, permanent deletion of your account and associated information. We will not be able to recover your account after it has been deleted.
- **Update Your Browser Settings.** If you wish to limit or opt out of third-party advertising, you can do one or more of the following:
  - The Options/Settings section of most internet browsers will tell you how to manage cookies and other technologies that may be uploaded to your device, including how to disable such technologies. You can disable our cookies, or all cookies, through your browser settings, but please note that disabling cookies may impact some of the features of our Services and prevent them from operating as intended. You can learn more about cookies, including how to see what cookies have been uploaded to your device and how to manage and delete them, by visiting [All About Cookies](#).
- **Digital Advertising Preferences.**
  - You can change your preferences with respect to certain online ads, and to obtain more information about ad networks and online behavioral advertising, visit the [National Advertising Initiative Consumer Opt Out page](#) and the [Digital Advertising Alliance's Consumer Choice Tool](#). Please note that even if you opt out of receiving interest-based advertising, you may still receive advertisements, but they will be more general in nature. In addition, the electronic device you use to visit our Services may offer relevant privacy settings; please see the device settings for details.
- **Opt Out of Marketing Messages.** If you sign up to receive marketing communications and materials, you consent to receive such communications at the location or contact information you provide.
  - **Email.** If you no longer wish to receive email marketing messages from Town Square, you should use the “unsubscribe” option that can be found in each marketing email we send or contact us using the information provided below. Within 10 days of receipt of your unsubscribe request, we will remove you from our distribution list unless you resubscribe.
  - **Text.** Town Square uses third-party text messaging services to communicate and share information with its subscribers. By subscribing, you have provided us with consent to send you text messages regarding our programs, events, and Services.
    - **Data Usage Clause:** We use your phone number solely to communicate important updates, including alerts and event notifications. We will not use it for any other purpose.

- **Message Frequency:** Message frequency may vary depending on the programs, events, activities, and Services provided by Town Square.
  - **Rates:** Message and data rates may apply. Your mobile carrier determines these charges, and they are your responsibility.
  - **STOP Instructions:** If you wish to stop receiving text messages from Town Square, reply **STOP** to any text message. You will receive a confirmation message and will no longer receive SMS communications from us. You may also stop text messages by calling us at (833) 869-6777 or emailing us at [privacy@townsquarehealth.com](mailto:privacy@townsquarehealth.com).
  - **HELP Instructions:** For assistance, reply **HELP** to any message, contact our support team at (833) 869-6777 or email us at [privacy@townsquarehealth.com](mailto:privacy@townsquarehealth.com).
  - **Carrier Liability:** Mobile carriers are not liable for delayed or undelivered messages.
  - **Non-Sharing Clause:** We respect your privacy and will not intentionally distribute your mobile phone number to any third parties for any purposes without your consent.
  - **Data Protection Clause:** We use restricted access controls and secure storage solutions to protect your data from unauthorized access or misuse. We retain your contact data for as long as needed to fulfill the purposes outlined in this Privacy Policy.
- **Phone.** You may request that we remove you from our telephone marketing list and refrain from sharing your telephone number with third parties by contacting us using the contact information provided below.

## 11. Leaving Our Services/Linking to Third Parties

We strive to ensure that any information you send us is safe. When you leave our Services and go to another linked website, we are not responsible for the content or availability of the linked website. Please be advised that we do not represent either the third party or you if you enter into a transaction on third-party websites. Further, the privacy and security policies of the linked websites may differ from those practiced by us. The inclusion of any link does not imply our endorsement of any other company, its website(s), or its product(s) and/or service(s). We are not responsible for the privacy practices or content of any other websites.

## 12. Social Media

Our Services may provide buttons or tools that allow you to interact with or share content on platforms like Facebook, X (formerly Twitter), Instagram, or others. These features may allow the social media platform to collect information about your device or your interactions with our

Services, including through cookies or similar technologies. The information collected by these platforms is subject to their own privacy policies and settings.

If you are logged into a social media account while using our online Services, the social media platform may associate your activity on our Services with your social media account. We do not control how these platforms collect, use, or share your information.

We may also maintain a presence on social media platforms and may interact with you if you choose to communicate with us through those channels. Any information you provide to us through social media will be handled in accordance with this Privacy Policy, while your interactions with the platform itself are governed by that platform's privacy practices.

For more information about how social media platforms collect and use data, please review the privacy policies of the platforms you use.

### **13. Children's Privacy**

Town Square's Services are not directed at children under 13. If you are under 13, do not use or provide any Personal Information to Town Square. If we learn that we have collected or received Personal Information from a child under 13 without parental consent, or if you become aware that we may have such information, alert us immediately at [privacy@townsquarehealth.com](mailto:privacy@townsquarehealth.com).

### **14. Links and Third-Party Sites**

Our Services may contain links to websites or content operated by third parties. These websites are not controlled by Town Square, and this Privacy Policy does not apply to their privacy practices. If you choose to visit a third-party website, any information you provide or that is collected by that website will be governed by the third party's own privacy policies and terms. We encourage you to review the privacy practices of any third-party website you visit.

### **15. California's Shine the Light Act**

If you are a California resident, under California's Shine the Light Law (California Civil Code Section 1798.83) you have the right to request the following information regarding our disclosure of your Personal Information to third parties for direct marketing purposes: (1) the categories of Personal Information we have disclosed to third parties for their direct marketing purposes during the preceding calendar year; (2) the names and addresses of the third parties that received the Personal Information; and (3) if the nature of the third party's business cannot be determined from their name, examples of the products or services they marketed. This information may be provided in a standardized form that is not specific to you. You are permitted to obtain this information from us once a year, free of charge. To make such a request, please submit your request in writing to:

Town Square Health, Inc.  
Attention: Legal Department

222 Merchandise Mart Plaza, Suite 228  
Chicago, IL 60654

## **16. International Users**

Our Services are operated in the United States and intended for users located in the United States. Our Services can be accessed by an international audience. If you are located outside of the United States, please be aware that information we collect, including Personal Information, will be transferred to, processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. In addition, such data may be stored on servers located outside your resident jurisdiction and in jurisdictions which may have less stringent privacy practices than your own.

## **17. Changes to This Privacy Policy**

As our organization changes over time, this Privacy Policy may change as well. We reserve the right to amend the Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy on our Services. We will provide you notice of material changes by indicating that the Privacy Policy has been updated on our homepage and will indicate the date we made the update above.

## **Contact Us**

Town Square Health  
222 Merchandise Mart Plaza, Suite 228  
Chicago, IL 60654  
Telephone: (833) 839-6777  
Email: [privacy@townsquarehealth.com](mailto:privacy@townsquarehealth.com)