



# Application and Website Privacy Policy

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## Revision History Log

Version	Date	Summary of changes
2.3	2021-04-30	Initial release in new policy format
2.4	2022-04-29	Added change log, corrected typo, updated for 2022
2.5	2023-04-20	Minor typographical changes
2.6	2024-05-03	Updated data ownership wording, Added HIPAA statement of fact, added client data retention stipulation
3.0	2025-03-11	Substantial changes to policy format to define Website, Patient, and Provider/End-User privacy and data usage, Policy name updated

## Purpose

Point and Click Solutions, Inc. ("PNC") produces the OpenSuite Electronic Health Record Web Apps software. This policy describes how PNC collects and uses information, including information collected on Our Websites.

## Scope

This policy applies to all website visitors, community forum registered participants, patients, providers, and healthcare organization users.

## Roles and Responsibilities

The Chief Privacy Officer is responsible for coordinating policy creation, implementation, enforcement, as well as compliance monitoring.

## Definitions

### Our Websites

#### PNC Staff Web Apps

[https://\\*.pointnclick.com](https://*.pointnclick.com)

Website, hosted by PNC, and utilized by healthcare organization staff to facilitate patient care. This website is part of the PNC OpenSuite Electronic Health Record Web Apps solution.

Healthcare organizations may choose to use branded URLs, which will utilize domain names specific to their organization.

#### PNC Patient Portal

[https://\\*.pointnclick.com](https://*.pointnclick.com)

Website, hosted by PNC, and utilized by Patients of healthcare organizations to facilitate patient care. This website is part of the PNC OpenSuite Electronic Health Record Web Apps solution.

Healthcare organizations may choose to use branded URLs, which will utilize domain names specific to their organization.

#### PncCommunity Forum

<https://forum.pointnclick.com>

User forum website, hosted by PNC, and utilized by healthcare organizations to discuss PNC.

#### PNC Status

<https://status.pointnclick.com>

System status website, hosted by ZoHo, used to provide public service status information about PNC.

#### PNC Company

<https://pointandclicksolutions.com>

Company website, hosted by Wix, used to provide public information about PNC and facilitate sales and engagement with healthcare organizations.

## Patients

Patients or clients receiving care provided by a healthcare organization.

## Providers

Health care providers, counseling and psychology professionals, clinicians, athletic trainers, Employees, volunteers, customers, and contracted employees, authorized by the healthcare organization.

## PncCommunity Forum Registered Participants

Registered participants who access the PncCommunity Forum.

## Public Website Visitors

Visitors who access the public PNC Company website or the public PNC Status website.

# Patient Policy

## Overview

The PNC Patient Portal website is maintained by PNC and provided to healthcare organizations who manage the service to provide patients with secure access to health information.

This policy describes how we, PNC, collect and use your information when you use the Patient Portal.

We may update this policy at any time, and future updates are effective as soon as they are published.

To use our Patient Portal, you must have an account with a healthcare organization. Because of this, your use of the Patient Portal is also subject to your healthcare organization's privacy

policy. Please contact your healthcare organization if you have any questions about their privacy policy and the type of information they collect.

## Your Personal Information

### The Limited Ways We Use Your Information

We do not sell or license your information. These are the limited ways we interact with your information in connection with the PNC Patient Portal:

- When you choose to view documents from your healthcare organization (such as letters or images) using our Patient Portal website, some files may be saved to the web browser's temporary storage location.
- When you choose to download or print documents from your healthcare organization (such as letters or images) using our Patient Portal website, these files may be saved to your device.
- When you choose to include images in a message you send to your healthcare organization using the Patient Portal, you may select an existing photo from your device or take a new photo within the Patient Portal. Depending on your device, the image may be saved to your camera app.
- If your healthcare organization offers telehealth visits using our Patient Portal, we do *not* record or store video or audio data from these visits.
- If your healthcare organization offers location-based check in for in-person appointments, you may choose to allow our mobile apps to interact with your location data for those purposes. We do *not* store your location data.
- While you use our Patient Portal, we collect the IP address, and other *non-identifying information* so we can provide customer service to you or your healthcare organization and understand how people use our Patient Portal so we can improve our products.
  - This information includes the time you began using the portal, the healthcare organization you interacted with, any error messages or codes, and areas within the portal you interacted with.
  - This information may be shared with 3rd parties for security and operational purposes.
  - This information may be retained for up to 1 year.
- Data retention is governed by the healthcare organization's policies, applicable laws and regulations, and contracts.
- If you contact us, we may keep a record of the communication. You can decide how much information you want to share with us in those cases.

## How We Protect Your Personal Information

PNC takes very seriously its obligation to protect the confidentiality of your personal information. The OpenSuite Electronic Health Record Web Apps ("Staff Web Apps", "Patient Portal") are intended to connect to servers and systems operated and maintained by PNC and the healthcare organizations that use PNC.

We use technical controls and safeguards to protect the privacy, security, integrity, and availability of your personal information.

- Your organization may enable the use of multi-factor authentication for users of the PNC Patient Portal.
- We use https for secure communication between servers, and when you visit the website.
- When you view data in the PNC Patient Portal, that data is temporarily stored on your device but is removed when your session ends.
- Data stored on PNC systems is encrypted at-rest and in-transit.
- We maintain internal policies and processes that limit access to your information to our staff who need to know the information to perform their jobs.

The healthcare organization you are affiliated with when using the PNC Patient Portal also uses safeguards to protect your information. Contact them if you have any questions about their safeguards.

## Steps you can take other steps to protect your information

- Do not share the username and password you use for accessing the PNC Patient Portal.
- If you believe any unauthorized access has occurred, change your password immediately and contact your healthcare organization.

## Your Rights

If you have questions about your medical information in an account with a healthcare organization using PNC software, please reach out to your healthcare organization using the contact information in their privacy policy. You may have data privacy rights under HIPAA or other applicable laws.

# Provider Policy

## Overview

The PNC Staff Web Apps website is maintained by PNC and provided to healthcare organizations who manage the service.

This policy describes how we, PNC, collect and use your information when you use the PNC Staff Web Apps.

We may update this policy at any time, and future updates are effective as soon as they are published.

To use our PNC Staff Web Apps, you must have an account with a healthcare organization. Because of this, your use of the PNC Staff Web Apps is also subject to your healthcare organization's privacy policy. Please contact your healthcare organization if you have any questions about their privacy policy and the type of information they collect.

## Your Personal Information

As described below, our applications are maintained by PNC and provided to healthcare organizations who manage the service.

## The Limited Ways We Use Your Information

While you use the PNC Staff Web Apps, we collect the IP address, and other *non-identifying information* so we can provide customer service to you or your healthcare organization and understand how people use the PNC Web Apps so we can improve our products.

- This information includes the time you began using the PNC Web Apps, the healthcare organization you interacted with, any error messages or codes, and areas within the website you interacted with.
- This information may be shared with 3rd parties for security and operations purposes.
- This information may be retained for up to 1 year.

## Connections to Healthcare Institutions

To use our applications, you must have an account with a healthcare institution who uses PNC's software. Your use of our application with that healthcare institution may be subject to that healthcare institution's policies and terms. While connected to or attempting to connect to a healthcare institution's system, the healthcare institution may collect, store, process, maintain, upload, sync, transmit, share, disclose, and use certain data and related information, including but not limited to information or data regarding the characteristics or usage of your device, system and application software, and peripherals as well as your personal information, location data, and other content.

Please contact your employer or other entity that provides your access to our applications if you have any questions about their policies or terms.

### **Using Third Party Tools and Features**

If you use any third-party tools and features, such as third-party speech-to-text dictation or third-party video, your use of those features is subject to the terms and policies of those third parties. If you have any questions about those terms or policies, you should contact your healthcare institution or the provider of the third-party tool.

## **How We Protect Your Personal Information**

PNC takes very seriously its obligation to protect the confidentiality of your personal information. The OpenSuite Electronic Health Record Web Apps ("Staff Web Apps", "Patient Portal") are intended to connect to servers and systems operated and maintained by PNC and the healthcare organizations that use PNC.

The security of your information and data while using our Applications is very important to us. Our Applications employ a variety of technical safeguards to protect the confidentiality, integrity, and availability of your personal information including supporting Transport Layer Security (TLS)/Secure Sockets Layer (SSL) certificate technology and encryption.

In addition, healthcare organizations with whom you connect may use a variety of physical, administrative, and technical measures to protect your personal information.

Data retention is governed by the healthcare organization's policies, applicable laws and regulations, and contracts.

## **Contact PNC**

If you have questions about medical information in an account with a healthcare organization using PNC's software, please reach out to your healthcare organization using the contact information in their privacy policy.

If you have any questions about this Privacy Policy, you may contact PNC at xxx-xxx-xxxx or at [privacy@pointnclick.com](mailto:privacy@pointnclick.com).



# Website and PncCommunity Forum Policy

## Overview

Point and Click Solutions, Inc. ("PNC") produces the OpenSuite Electronic Health Record Web Apps software.

This Privacy Policy describes how we collect and use your information when you visit Our Websites.

We may update this policy at any time, and future updates are effective as soon as they are published. If you are interested, you should check back from time to time and make sure that you have reviewed the most current version of this policy.

## Information You Provide to Our Websites

### Information You Give Us

You may contact us through [the methods listed on Our Website](#). If you contact us, we may keep a record of the communication to help answer or resolve the matter you contacted us about. You can decide how much information you want to share with us in those cases.

### Our Website and Servers, Your Use of Browsers

When you use Our Websites, our servers may automatically collect and record information. In most cases, this information is generated by technologies, such as "cookies," "flash LSOs," "web beacons" or "clear GIFs." You can read more about how we use cookies below.

Your browser or device may tell us your:

- Browser type
- Language preference
- Internet Protocol (IP) address (which may tell us generally where you are located)
- Type of device or system you used

Your browser may also tell us:

- The time and date of your request
- The page that led you to Our Website
- What you typed into a search engine that led you to Our Website, if applicable

**Cookies**

We use strictly necessary cookies on Our Websites to perform the critical site function of keeping website visitors on the same server they initially connected to when they first navigated to one of our websites (i.e., for load balancing).

We utilize Wix for our PNC Company Website, which may collect aggregated usage Personal Information, such as Visitors' and Users' browsing and 'click-stream' activity on the Services, session heatmaps and scrolls, non-identifying Personal Information regarding the Visitor's or User's device, operating system, internet browser, screen resolution, language and keyboard settings, internet service provider, referring/exit pages, date/time stamps, etc according to their [privacy policy](#).

We utilize Zoho Site24x7 for our PNC Status website, which may collect aggregated usage Personal Information, such as Visitors' and Users' browsing and 'click-stream' activity on the Services, session heatmaps and scrolls, non-identifying Personal Information regarding the Visitor's or User's device, operating system, internet browser, screen resolution, language and keyboard settings, internet service provider, referring/exit pages, date/time stamps, etc according to their [privacy policy](#).

**Information You Provide to Our PncCommunity Forum Website**

We use our PncCommunity Forum Website to help foster a positive user community. When you use the certain information may be collected. The information you provide directly to our website as part of the forum community is collected with your consent, and is collected in addition to the information you provide through Our Websites (as listed above) and may include:

- Contact information
- Organization information
- Meeting information
- System information
- Other information provided to the community

**How Do We Use Your Information?**

The information that you provide to us during the sales process is retained and processed to facilitate sales leads. We may use this information for purposes such as:

- Contacting your organization
- Processing and storing your data for internal tracking metrics
- Improving PNC services
- Fostering community engagement

**Who Has Access to Your Information?**

PNC staff

**How Long Do we Keep Your Information?**

PMC will retain your information as outlined in the PNC Data Retention Policy.

## Information You Provide to Our PNC Company Website

We use our PNC Company Website to help facilitate our sales process. When you contact us through our website, we may ask you for certain information. The information you provide directly to our website as part of the sales process is collected with your consent, and is collected in addition to the information you provide through Our Websites (as listed above) and may include:

- Contact information
- Job Title
- Organization information

### How Do We Use Your Information?

The information that you provide to us during the sales process is retained and processed to facilitate sales leads. We may use this information for purposes such as:

- Contacting your organization
- Processing and storing your data for internal tracking metrics
- Improving the sales process

### Who Has Access to Your Information?

PNC Sales staff

### How Long Does we Keep Your Information?

PMC will retain your information for 7 years per the PNC Data Retention Policy.

## How We Protect Your Personal Information

PNC takes very seriously its obligation to protect the confidentiality of your personal information.

PNC stores the sales information on PNC company systems and services which are secured using the PNC Hardening Standards, including encryption and restricting access to only those needed within PNC.

### Links to Other Sites

Our Websites contain links to other sites and may contain embedded media hosted by third parties. PNC is not responsible for the content or privacy practices of other sites. We encourage you to be aware when you leave our site or engage with media hosted by third parties and to read the privacy statements of any other site that collects your information.

## Your Privacy Rights

### GDPR and UK GDPR Privacy Questions

If you need to contact our Data Protection Officer or EU Representative, please email [privacy@pointnclick.com](mailto:privacy@pointnclick.com) or call +1 781.272.9800

If you are a Data Subject as defined by GDPR and you have questions related to personal data held by a healthcare organization that uses PNC software, you should reach out to your healthcare organization for requests related to that personal data.

## Contact PNC

If you have questions about your medical information in an account with a healthcare organization using PNC software, please reach out to your healthcare organization using the contact information in their privacy policy.

If you have any questions about this policy, contact us at [privacy@pointnclick.com](mailto:privacy@pointnclick.com) or You may contact us through [the methods listed on Our Website](#).