

Messaging and Website Privacy Policy	NUMBER: ISP.056		Page 1 of 3
PREPARED BY: Zel Negassa, CIO	Date Originated: 12/2024	Date Revised:	Effective Date: 12/30/2024
APPROVED BY:			
CEO/Executive Director:	 _____ Signer ID: OE53KXXEK6...		12/12/2024 EST _____ Date
	Signature		Date

POLICY TITLE: Messaging and Website Privacy Policy

Purpose

Greater Philadelphia Health Action, Inc. (GPHA) takes your privacy seriously, and we want you to know how we collect, use, share, and protect your information when you visit our website or use our related mobile applications or opt-in for messaging.

Applicability of This Policy

Please note this Privacy Policy (“Privacy Policy”) does not apply to Protected Health Information (PHI) that is subject to privacy regulations published under the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA). We separately address how your PHI is handled in our [Notice of Privacy Practices](#), which is available at each office location or [online](#).

The information contained in this document does not constitute medical or healthcare advice for any individual problem. It is not a substitute for medical or other professional advice and services from a qualified healthcare provider familiar with a patient’s unique facts. Individuals with health concerns should always consult a healthcare provider for any health problem or medical condition, and/or prior to the start of any new treatment.

Collection of Personal Information You Submit

When you use this website or messaging service, we may collect personal information that you voluntarily provide when you submit an inquiry, register for an event, or interact with our services. By doing so, you are giving GPHA your permission to use the information for the stated purpose.

This personal information may include: Name, Email address, Telephone number, Zip code, and Any other details you voluntarily choose to submit.

Providing this information is voluntary; however, choosing not to provide certain details may limit your ability to access all features of the website or messaging services.

Automatically Collected Information

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In addition to personal information you submit, GPHA and its vendors use analytics tools and third-party technologies to collect certain information automatically. This data helps us improve services and tailor user experiences. Automatically collected information may include:

- Internet domain from which you access the website
- Internet Protocol (IP) address of your device
- Browser type and version
- Date and time of access
- URLs (web addresses) of visited pages
- Name, email, and phone number if provided

For example, cookies—small files stored on your device—are used to remember session information and enhance website functionality. Most web browsers allow you to control or disable cookies. For instructions on opting out of cookies, visit <https://www.usa.gov/optout-instructions>.

Authorization to Communicate with You

When you use our services, GPHA will obtain and confirm your consent to communicate with you about service-related matters, including reminders, notifications, alerts, billing, and satisfaction surveys.

You may opt out of communication at any time by:

- Contacting our offices directly
- Following the instructions provided in the message, such as clicking "unsubscribe" or replying "STOP."

Use of Personal Information

GPHA uses information obtained through this website, service delivery, and other sources for purposes such as:

- Providing information, items, or services you requested or agreed to receive
- Responding to inquiries and communicating via email, phone, or text, in line with your preferences
- Processing registrations for events, newsletters, and secure pages
- Managing website functionality and user accounts
- Personalizing and optimizing user experiences
- Preventing unauthorized, fraudulent, or illegal activities

We do not sell or rent your personal information. Personal data is shared only in compliance with this Privacy Policy, our Notice of Privacy Practices, and applicable regulations.

Disclosure of User Information

GPHA may disclose user information in the following scenarios:

- Legal Compliance: To comply with laws, regulations, court orders, or other legal obligations. This may include assisting in fraud prevention or harm investigations.
- Corporate Transactions: During reorganization, merger, sale, or transfer of business assets.
- Security and Safety: To address emergencies, prevent harm, or protect the integrity of GPHA services.

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We limit data sharing to subsidiaries, affiliates, and vendors where necessary and in accordance with contractual obligations.

Information Security

GPHA implements reasonable and appropriate safeguards to protect personal information from unauthorized access, use, or disclosure. While no system is completely secure, we are committed to mitigating risks associated with internet-based data transmission.

Data Storage and Maintenance

All user data is stored within the United States and is subject to U.S. laws. By using this website or services, you consent to this data storage arrangement.

Links to Other Websites

This website may contain links to external websites with different privacy practices. GPHA is not responsible for the privacy practices of these external websites. We encourage users to review the privacy policies of any third-party websites they visit.

Your Rights

You have the right to:

- Access, correct, or delete personal information collected through this website
- Withdraw consent for communications
- File a complaint if you believe your privacy rights have been violated

To exercise these rights, contact us using the details provided below. GPHA is committed to responding to such requests within a reasonable timeframe and in accordance with applicable laws.

Contact Us

For questions or concerns about this Privacy Policy, please contact:

Privacy Officer
Zel Negassa, CISSP, PMP, HCISPP, CISA
Email: hipaa@gphainc.org | Phone: (215) 925-6983 | Website: <https://www.gphainc.org>

Review and Updates

This policy will be reviewed annually and updated as needed to reflect changes in technology, security standards, or business requirements.

Reference(s):

Policy Title	Policy Number

Scope

This policy applies to all individuals using GPHA's website, mobile applications, or messaging services.

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Signature Certificate



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