

## **ROC COVID Privacy Policy**

### Who We Are:

ROC COVID is a community public health initiative conducted by Finger Lakes Health Systems Agency, a New York domestic not-for-profit corporation doing business as “Common Ground Health”, in collaboration with its clinical and public health partners: the University of Rochester, Rochester Regional Health, and the Monroe County Department of Public Health.

Common Ground Health knows you care about how your information is used and shared. We take protecting your privacy very seriously.

Please read the following to learn more about how we use and protect information collected through our Greater Rochester COVID-19 Daily Health Screening Program’s website, mobile interface(s) and related services (the “Chat Bot” or the “Program”).

### What is the Program?

This Program is designed to collect information about the symptoms of COVID-19 (coronavirus) in order to gain information about how the disease is progressing through our community and to plan for the resources needed to care for the public.

### Acceptance of Terms:

By using the Program in any manner, you acknowledge that you accept the practices and policies outlined in this COVID-19 Daily Health Screening Program Privacy Policy (this “Privacy Policy”). You consent that we will collect, use, and share your information as we describe below. If you do not agree with this Privacy Policy or the Terms of Use, do not access or use the Program.

### Types of Information to Be Collected:

When you use the Program or Chat Bot, you understand that we will be collecting your responses to our questions, including your gender, your age range, how you feel, and whether you have certain symptoms. We also ask that you share your location via device settings or in response to a question (e.g. asking for your zip code). We will improve our Chat Bot and amend our questions from time to time. All of this is considered “Personal Information”.

We are not asking your name but may use unique identifiers to recognize your data relates to one person so we can avoid duplicate reporting. We will offer you the opportunity to provide your email address or mobile phone number to allow us to provide information to you via email or text message. SMS messages (including text messages) shall be provided by Monroe County. You are not required to provide this information.

The Program may also automatically receive technical information relating to your usage of the Program such as your IP address, operating system, device, features used, content viewed and downloaded, the dates and times of your interactions with the Program and other

information. We may use this information to understand, customize and improve user experience with the Program and the Study.

### How Will This Information Be Used and Shared?

Common Ground will use the data to operate a Greater Rochester area coronavirus daily health screening program. Common Ground will store the answers you provide and may share this data in an aggregated or other forms with researchers in or outside its group under criteria established by Common Ground and its collaborators. This may include healthcare organizations, researchers, academics, government agencies, public health authorities, as well as public or not-for-profit entities interested in health data. Common Ground may also share data or information with the general public through journal publications or postings in the effort to fight COVID-19.

We may use contact information you provide to communicate with you, including through email and/or SMS text messaging if you elect to provide such information. If you no longer wish to receive email you can notify us by email at [help@roccovid.org](mailto:help@roccovid.org), and if you no longer wish to receive text messages, you can unsubscribe by replying STOP to a text you receive from us.

We do not collect and will not share your name. We may aggregate and/or de-identify information collected by the Program or other means so that the information is not intended to identify you. Our use and disclosure of aggregated and/or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation, consistent with applicable laws and regulations.

We may disclose information collected through the Program as required by law, when we believe disclosure is necessary to comply with a regulatory requirement, judicial proceeding, court order, or legal process served on us, or to protect the safety, rights, or property of Common Ground or the public. We will not sell or share the information collected for advertising purposes.

We are planning to keep data collected as long as needed and useful for scientific, medical research and healthcare purposes.

### What does this Privacy Policy cover?

This Privacy Policy covers our treatment of Personal Information that we gather when you use the Chat Bot or otherwise access or use the Program. This Privacy Policy does not apply to the practices of companies or institutions that we do not own or control, or to individuals that we do not employ or manage.

Please note, since Common Ground Health is not a “Covered Entity” and since you are providing this information voluntarily outside of a doctor’s office or hospital, your information and data is not subject to HIPAA (the Health Insurance Portability and Accountability Act). We will work to keep your information secure, as described below.

### Use of the Program by Minors:

Common Ground does not knowingly collect or solicit Personal Information from anyone under the age of 18 or knowingly allow such persons to register for the Program. If you are under 18, you must not use the Chat Bot or attempt to register for the Program, and you must not send any information about yourself to us. If we learn that we have collected Personal Information from a person under age 18, we will delete that information.

### Is Personal Information about me secure?

We endeavor to protect the privacy of the Personal Information we hold in our records, but we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of your Personal Information at any time. By using the Program, you accept this risk. All information collected by the Program will be processed in the United States.

### What choices do I have?

You may choose not to participate this Program and you do not have to use the Chat Bot. Your participation is voluntary and have the right to discontinue participation at any time. If you withdraw from the Program, we will retain all information about you that was collected prior to that point and continue to use such information as described in this Privacy Policy. If you have questions about withdrawing or have believe you have submitted incorrect or incomplete information, please contact us at [help@roccovid.org](mailto:help@roccovid.org).

You may be able to add, update, or delete certain information as explained above. When you update or delete information, we may maintain a copy of the unrevised information in our records.

### Effective Date and Changes to this Privacy Policy

This Privacy Policy is effective as of June 2, 2020. Common Ground may change this Privacy Policy from time to time. We encourage you to check this page for any new versions of this Privacy Policy. By continuing to access, browse, and/or use the Program, you agree to accept any posted revised terms.

This Privacy Policy is part of our Terms and Conditions and is governed by and construed in accordance with the laws of the State of New York.

### Questions or concerns?

If you have any questions or concerns regarding the topics addressed in this Privacy Policy, please send an email to: [help@roccovid.org](mailto:help@roccovid.org).

ROC COVID Privacy Policy version 1.1, effective June 2, 2020

#### **Version History**

ROC COVID Terms of Use version 1.1, effective June 2, 2020

ROC COVID Terms of Use version 1.0, effective May 1, 2020