



PolyRemedy, Inc. Privacy and Security Policy

Date of Last Revision: 7.30.2010

This Privacy and Security Statement (Privacy Statement) applies to patient health information collected by PolyRemedy, Inc. (PolyRemedy). PolyRemedy is committed to protecting the privacy of the patients (Patients) who receive the wound dressings and the healthcare providers (Providers) who use the system to assist in the treatment of their Patients. PolyRemedy has created the following Privacy Statement to give an overview of the types of information it collects, how the information is used, and how the information is safeguarded.

PRIVACY

Who Collects The Information?

PolyRemedy collects Personally Identifiable or Protected Health Information, (“PHI”) by means of electronic communication with the Patient record filing system that resides with the Provider’s institution, or by means of direct Provider input to PolyRemedy’s Personalized Woundcare System (WoundAlly™).

PolyRemedy staff members who may handle or transmit PHI include: Information Technology, Developers, Clinical Research and Evaluation staff, Operations and Quality staff and Field Service Engineers, as well as those responsible for the PolyRemedy Technical Support function.

What Information Is Collected?

Patient Information is required to use the WoundAlly system. This includes:

- Contact information, such as name, mailing address, e-mail address and phone number,
- Demographic information, such as gender and date of birth
- Health - related information, such as medical diagnosis, medical procedures, and recommended wound care products
- History of wound condition and wound care provided
- Healthcare provider’s name, address, e-mail address, and phone number
- Information provided by Patients and Providers in forms or surveys

Why Do We Collect This Information?

Protected Health Information is provided to PolyRemedy to allow for the production and delivery of PolyFIT™ wound dressings customized to meet the size, shape and healing condition of a Patient’s specific wound.



What Information Is Shared With Third Parties?

Information collected by PolyRemedy is shared with the Provider to assist in the treatment of their Patients. PolyRemedy may disclose information that Patients or Providers give to us to independent contractors, service providers and consultants (collectively known as “Business Associated”) who assist us in our business or in providing goods and services. However, we will only share such personally identifiable information as we deem necessary for them to carry out their obligations to PolyRemedy and for no other purpose.

We may also share aggregated patient health information with independent contractors, service providers and consultants in order to assess and disclose the performance capabilities of PolyRemedy’s WoundAlly System; and to assist in the analyses of procedure data in order to improve wound care practices. Aggregated data are not linked to any personal information that can identify any individual Patient.

PERSONALLY IDENTIFIABLE HEALTH INFORMATION IS NOT SOLD TO THIRD PARTIES.

PolyRemedy will disclose personal information it has collected if necessary to fulfill its obligations to Providers or if it is required to do so by law or, if in its good faith judgment, such action is reasonably necessary to comply with legal process, to respond to any claims, or to protect the rights of PolyRemedy and the public.

In the event that PolyRemedy goes through a business transition, such as a merger, being acquired by another company or selling a portion of its assets, all data including Patient and Provider personal information generally is one of the transferred business assets.

SECURITY

The following outlines different types of security procedures PolyRemedy has in place to protect the loss, misuse or alteration of the information collected.

Identification and Authentication

Access to the data is assigned to specific individuals in order to maintain strict control over access. We do not grant general access to data within PolyRemedy and, except as set forth in this Privacy Statement, access to data is not granted to parties outside PolyRemedy. We also verify the identity of the persons accessing the data by using a login name and a password. Passwords are required to be six characters and include a non-alphabetic character and login session times-out after a period of time to prevent unauthorized use.



Authorization and Access Control

Only authorized personnel have access to restricted data. Access to sensitive data is revoked in a timely manner for employees who change function or are no longer employed by or working on behalf of PolyRemedy.

Data Confidentiality

PolyRemedy uses a security firewall to restrict remote access to its internal systems.

Data Integrity and Retention

PolyRemedy implements full database backups to establish data consistency and integrity. PolyRemedy's servers are located in a secure and environmentally controlled room. Backups are automated and scheduled routinely.

Data Management and Monitoring

All employees of PolyRemedy are informed of the Company's security policies. PolyRemedy's new hires are briefed on security and privacy issues and security measures are reviewed regularly. PolyRemedy staff who are responsible for handling and/or reviewing patient health information will have received HIPAA Training certification.

Security and privacy threats, operational and technical vulnerabilities have been assessed and countermeasures have been taken to reduce these vulnerabilities.

Notification of Changes

PolyRemedy reserves the right to make changes to the Privacy Statement at any time. If we plan to make significant changes to any of our privacy policies or practices with respect to how we use personally identifiable information, we will post those changes to our web site 30 days before they take effect.

Addressing Privacy & Security Concerns

If you have any questions about this Privacy Statement, its policies or practices, or wish to receive a printed version of this Privacy Statement, please contact us:

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