

Operation Onward Privacy Policy

THIS NOTICE DESCRIBES HOW PERSONAL AND MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.

PLEASE REVIEW IT CAREFULLY.

Operation Onward is required by law to protect the privacy of your personally identifiable information (“PII”), to provide you with notice of its legal duties and privacy practices with respect to your information, to notify you if you are affected by a breach of unsecured information, and to follow the terms of our notice that is currently in effect. If you have questions about any part of this notice, or if you want more information about the privacy practices at Operation Onward, please contact:

Privacy Officer
Operation Onward
340 Commercial Street
Manchester, NH 03101
(844) 576-1377
giving@operationonward.com

Effective Date of this notice: April 18, 2022

Operation Onward collects PII from you and may store it on printed paper and on electronic computer systems. The collection of your PII is considered part of your Donation Record with our organization. Operation Onward cares about and protects the privacy of your information.

I. How Operation Onward may use or disclose your information

The law allows Operation Onward to use or disclose your PII for the following purposes:

1. Awards: We may use and share your information with other professionals who are working with Operation Onward to provide you with an award. For example, we may use or disclose your information with doctors, therapists, or mobility technology professionals to ensure that you are provided with the mobility option that is most appropriate for you.
2. Monetary Donations: We may use and share your PII to secure a donation from an organization that is supporting you in the award of a mobility device from Operation Onward, or to bill and get payment from a donor or other entity (if applicable). For example, we may disclose your information to one or more non-profit organizations to allow them to pay for all or part of an awarded device.
3. Operations: We may use and share your PII to run our organization, improve our services to you, and contact you when necessary. For example, we may use and disclose your information for quality assessments, audits, business planning, business administration, and to ensure compliance with federal or state law.

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4. Information provided to you: We may discuss your information with you to better understand your mobility technology needs.
5. Appointment reminders: We may use and disclose your information to contact you to remind you that you have an appointment with us.
6. Individuals involved in your care or payment for your award: When appropriate, we may share information with a person who is involved in your medical care or payment for your award, such as your family, close friend, or non-profit organization. We also may notify your family about your location or general condition or disclose such information to an entity assisting in a disaster relief effort.
7. Research: Under certain circumstances, we may use and disclose information for research purposes. For example, a research project may involve comparing the anticipated use of a mobility device by an awardee to those who received another, for the same medical condition. Before we use or disclose information for research, the project will go through a special approval process. Even without special approval, we may permit researchers to look at records to help them identify awardees who may be included in their research project or for other similar purposes, as long as they do not remove or take a copy of any information.

SPECIAL SITUATIONS

1. As required by law. We will disclose your information when required to do so by international, federal, state, or local law.
2. To avert a serious threat to health or safety. We may use and disclose your information when necessary to prevent a serious threat to your health and safety or the health and safety of others. Disclosures, however, will be made only to someone who may be able to help prevent the threat.
3. Business Associates. We may disclose information to our Business Associates that perform functions on our behalf or provide us with services if the information is necessary for such functions or services. For example, we may collaborate with a security company to ensure that your information is appropriately safeguarded. All of our Business Associates are obligated to protect the privacy of your information and are not allowed to use or disclose any information other than as specified in our contract.
4. Military and veterans. If you are a member of the armed forces, we may release information as required by military command authorities. We also may release information to the appropriate foreign military authority if you are a member of a foreign military.
5. Workers' compensation. We may release information for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illness.

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6. Public health risks. We may disclose your information for public health activities. These activities generally include disclosures to prevent or control disease, injury, or disability; to report births and deaths; to report child abuse or neglect; to report problems with products; to notify people of recalls of products they may be using; to prevent a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition from spreading it to the public; and to report to the appropriate government authority if we believe an individual has been the victim of abuse, neglect, or domestic violence. We will only make these disclosures if you agree or when we are required or authorized by law.
7. Oversight activities. We may disclose your information to an oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections, and licensure. These activities may be necessary for compliance with applicable federal or state laws.
8. Data breach notification purposes. We may use or disclose your information to provide legally required notices of unauthorized access to or disclosure of your information.
9. Lawsuits and disputes. If you are involved in a lawsuit or a dispute, we may disclose your information in response to a court or administrative order. We also may disclose information in response to a subpoena, discovery request, or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.
10. Law enforcement: We may release your information if asked by a law enforcement official if the information is (1) in response to a court order, subpoena, warrant, summons, or similar process; (2) limited information to identify or locate a suspect, fugitive, material witness, or missing person; (3) about the victim of a crime even if, under certain very limited circumstances, we are unable to obtain the person's agreement; (4) about a death we believe may be the result of criminal conduct; (5) about criminal conduct on our premises; (6) in an emergency to report a crime, the location of the crime or victims, or the identity, description, or location of a person who committed the crime.
11. Coroners and medical examiners. We may release your information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death.
12. National security and intelligence activities. We may release your information to authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.
13. Protective services for the president and others. We may disclose information to authorized federal officials so they may provide protection to the president of the United States, other authorized persons, or foreign heads of state, or conduct special investigations.
14. Inmates or individuals in custody. If you are an inmate of a correctional institute or under the custody of a law enforcement official, we may release your information to the correctional

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institute or law enforcement official. This release would be, if necessary (1) for the institute to provide you with health care, (2) to protect your health and safety or the health and safety of others, or (3) to protect the safety and security of the correctional institution or law enforcement official.

USES AND DISCLOSURES THAT REQUIRE US TO GIVE YOU AN OPPORTUNITY TO OBJECT AND OPT OUT

1. Individuals involved in your care or payment for your award. Unless you object, we may disclose to a member of your family, a relative, a close friend, a donor, or any other person you identify, your information that directly relates to that person or entity's involvement in your award. Even if you object, we may disclose your information to a donor if it is necessary to proceed with an award, unless you choose to opt out of receiving the award. If you are unable to agree or object to such a disclosure, we may disclose such information as necessary if we determine that it is in your best interest based on our professional judgment.
2. Disaster relief. We may disclose your information to disaster relief organizations that seek your information to coordinate your care or notify family and friends of your location or condition in a disaster. We will provide you with an opportunity to agree or object to such a disclosure whenever we practically can do so.

YOUR WRITTEN AUTHORIZATION IS REQUIRED FOR OTHER USES AND DISCLOSURES

- I. Unless otherwise required by this Privacy Policy, the following uses and disclosures of your information will be made only with your written authorization:
 1. Uses and disclosures of award information;
 2. Uses and disclosures for marketing purposes; and
 3. Disclosures that constitute a sale of your information.
- II. When Operation Onward may not use or disclose your information:

Operation Onward will not use or disclose your information without written authorization, except as provided in this Privacy Policy. If you authorize Operation Onward to use or disclose your information for another purpose, you may revoke your authorization in writing at any time by submitting a written notice of revocation to:

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Upon receipt of such written revocation, we will no longer disclose your information under the authorization. However, use and disclosure that was made in reliance of your authorization before you revoked it will not be affected by the revocation.

III. Your information rights:

You have the following rights regarding information that we have about you:

1. Right to inspect and copy. You have a right to inspect and copy information that may be used to make decisions about your award or payment for your award. This includes medical and billing records, other than psychotherapy notes. To inspect and copy this information, you must make your request in writing to:

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We have up to 30 days to make your information available to you. We may deny your request in certain limited circumstances, including situations where we are legally obligated to keep the information confidential. If we do deny your request, you have the right to have the denial reviewed by a licensed arbitration professional who was not directly involved in the denial of your request, and we will comply with the outcome of the review.

2. Right to an electronic copy of your electronic records. If your information is maintained in an electronic format, you have the right to request that an electronic copy of your record be given to you or transmitted to another individual or entity. We will make every effort to provide access to your information in the form or format that you request if it is readily producible in such form or format. If your information is not readily producible in the form or format that you request, your record will be provided in either our standard electronic format, or if you do not want this form or format, a readable hard copy form.
3. Right to get notice of a breach. You have the right to be notified of a breach of any of your unsecured information.
4. Right to amend. If you feel that information we have about you is incorrect or incomplete, you may ask us to amend the information. You have the right to request an amendment for as long as the information is kept by or for Operation Onward. To request an amendment, you must make your request in writing to:

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We typically have up to 60 days to respond to your request for amendment. We may deny your request in certain limited circumstances, including situations where we are not legally permitted to amend the information.

5. Right to an accounting of disclosures. You have the right to request a list of certain disclosures of information that we made, excluding disclosures made for certain purposes, including treatment, payment, health care operations, national security, or for which you provided written authorization. To request an accounting of disclosures, you must make your request in writing to:

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6. Right to request restrictions. You have the right to request a restriction or limitation on the information we use or disclose for awards, payment, or our operations related to your award. You also have the right to request a limit on the information we disclose to someone involved in your care or the payment of your award, such as a family member, friend, donor, or non-profit organization. For example, you could ask that we do not share information about your medical condition with a donor or financing organization. To request a restriction, you must make your request in writing to:

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We are not required to agree to your request unless you are asking us to restrict the use and disclosure of your information to a donor or financing organization and such information you wish to restrict pertains solely to an item or service for which you have paid “out of pocket” in full. If we agree, we will comply with your request unless the information is needed to provide you with an award.

7. Out-of-pocket payments. If you paid “out of pocket” in full for a specific item or service, you have the right to ask that your information with respect to that item or service not be disclosed to a donor or financing organization, and we will honor that request unless the information is needed to provide you with an award.
8. Right to request confidential communications. You have the right to request that we communicate with you about awards in a certain way or at a certain location. For example, you

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can ask that we only contact you by mail or at work. To request confidential communications, you must make your request in writing to:

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Your request must specify how or where you wish to be contacted. We will accommodate all reasonable requests.

9. Right to a paper copy of this notice. You have the right to a paper copy of this notice. You may ask us to give you a copy of this notice at any time. Even if you have agreed to receive this notice electronically, you are still entitled to a paper copy of this notice. You may obtain an electronic copy of this notice at our website (<https://www.operationonward.org/>). To obtain a paper copy of this notice, you must make your request in writing to:

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IV. Changes to this Privacy Policy

Operation Onward reserves the right to amend this Privacy Policy at any time and for any reason, and to make the new provisions effective for all information that it maintains, including information that was created or received prior to the date of such amendment. Until such amendment is made, Operation Onward is required by law to comply with this notice.

Operation Onward will provide you with an updated Privacy Policy upon request. Requests must be made in writing to:

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