

**HIPAA Privacy Policy #1**  
**Policy Overview and Handling Protected Health Information**

Effective Date January 22, 2020:	Refer to Privacy Rule Sections: N/A
Authorized by: Equinox Board of Directors	Version #: .

We at Equinox, Inc. are dedicated to protecting the privacy, security and integrity of our patients’ health information. All members of the Equinox, Inc. community including employees, medical staff members, volunteers, trainees, vendors, contractors, consultants and agents have an obligation and responsibility to safeguard our patient’s health information and to familiarize themselves with those policies and procedures contained in this HIPAA Privacy Policies and Procedures Manual (referred to collectively as the “Privacy Policy”) that are applicable to their responsibilities at Equinox, Inc.. Fulfillment of these responsibilities will help ensure that our patients’ Protected Health Information is private and secure.

**Purpose:** The policies and procedures set forth in this Privacy Policy are intended to protect the privacy and security of Protected Health Information in accordance with the privacy rules set forth in the Department of Health and Human Services (“HHS”) regulations at *45 C.F.R. Part 160 and Part 164, Subparts A, D and E* (“HIPAA Privacy Rule”).

**Policy:** The Privacy Policy shall apply to any and all Protected Health Information maintained, used or disclosed by Equinox, Inc. in accordance with the procedures set forth in the Privacy Policy.

It is the intent of Equinox, Inc. to comply with all relevant State laws governing health information privacy, unless preempted by the Employee Retirement Income Security act (“ERISA”) or the HIPAA Privacy Rule. If any provision of the Privacy Policy is inconsistent with the HIPAA Privacy Rule, or a more restrictive New York State privacy law, the Privacy Policy will be interpreted so that it complies with such law. Questions as to whether a State law applied to the Privacy Policy is preempted by ERISA or the HIPAA Privacy Rule shall be resolved by the Privacy Officer.

We all must remember that once PHI is used or disclosed, it often cannot be retrieved. We encourage everyone to be prudent and diligent in the disclosure of Protected Health Information. If there are any questions or concerns, please contact the Privacy Officer.