

North American Family Institute, Inc.
NOTICE OF PRIVACY PRACTICES

Effective Date: February 2026

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY. THIS NOTICE ALSO DESCRIBES NEW FEDERAL CONFIDENTIALITY RULES FOR SUBSTANCE USE DISORDER (SUD) TREATMENT RECORDS MAINTAINED BY CERTAIN PROGRAMS (42 C.F.R. PART 2). SUD RECORDS RECEIVE EXTRA PROTECTIONS, AS DESCRIBED IN THIS NOTICE.

We are required by law to protect the privacy of health information that may reveal your identity, and to provide you with a copy of this notice, which describes the health information privacy practices of North American Family Institute, Inc. (“NAFI”). A copy of our current notice will always be posted at all registration and/or admission points. You will also be able to obtain your own copies by accessing our website www.nafi.com or calling the Privacy Officer at 978.774.0774.

If you receive SUD treatment, those records are protected by additional federal law. You have specific rights and additional restrictions that apply to these records, including how they may be used, released, and their use in legal proceedings, as described in this notice.

If you have any questions about this notice or would like further information, please contact the above referenced individuals.

WHAT HEALTH INFORMATION IS PROTECTED

We are committed to protecting the privacy of information we gather about you while providing health-related services. Some examples of protected health information include information indicating that you are a patient or are receiving health-related services from us, information about your health condition, genetic information, or information

about your health care benefits under an insurance plan, each when combined with identifying information, such as your name, address, social security number or phone number.

REQUIREMENT FOR WRITTEN AUTHORIZATION

Generally, we will obtain your written authorization before using your health information or sharing it with others. There are certain situations where we must obtain your written authorization before using your health information or sharing it, including:

Marketing. We may not disclose any of your health information for marketing purposes if we will receive direct or indirect financial remuneration not reasonably related to our cost of making the communication.

Sale of Protected Health Information. We will not sell your protected health information to third parties. The sale of protected health information, however, does not include a disclosure for public health purposes, for research purposes where we will only receive remuneration for our costs to prepare and transmit the health information, for treatment and payment purposes, for the sale, transfer, merger or consolidation of all or part of NAFI, for a business associate or its subcontractor to perform health care functions on our behalf, or

for other purposes as required and permitted by law.

If you provide us with written authorization, you may revoke that written authorization at any time, except to the extent that we have already relied upon it. To revoke a written authorization, please write to the Privacy Officer. You may also initiate the transfer of your records to another person by completing a written authorization form.

A special written consent meeting all requirements of 42 C.F.R. Part 2 is required to use or disclose SUD records, including for most disclosures for treatment, payment, or health care operations (TPO), unless otherwise permitted by law. General authorizations or release forms are not sufficient for SUD records. Patient consent for use or disclosure of SUD records in any civil, criminal, administrative, or legislative proceeding must be provided on a separate, stand-alone consent form dedicated to that purpose.

HOW WE MAY USE AND DISCLOSE YOUR HEALTH INFORMATION WITHOUT YOUR WRITTEN AUTHORIZATION

There are some situations when we do not need your written authorization before using your health information or sharing it with others, including:

1. Treatment, Payment and Health Care Operations.

Treatment. We may share your health information with health care providers who are involved in taking care of you, and they may in turn use that information to diagnose or treat you. A health care provider may share your health information with another health care provider to determine how to diagnose or treat you. Your doctor may also share your health information with another health care provider

to whom you have been referred for further health care.

Payment. We may use your health information or share it with others so that we may obtain payment for your health care services. For example, we may share information about you with your health insurance company in order to obtain reimbursement after we have treated you. In some cases, we may share information about you with your health insurance company to determine whether it will cover your treatment.

Health Care Operations. We may use your health information or share it with others in order to conduct our business operations. For example, we may use your health information to evaluate the performance of our staff in caring for you, or to educate our staff on how to improve the care they provide for you.

2. Appointment Reminders, Treatment Alternatives, Benefits and Services. In the course of providing treatment to you, we may use your health information to contact you with a reminder that you have an appointment for treatment, services or refills or in order to recommend possible treatment alternatives or health-related benefits and services that may be of interest to you.

3. Business Associates. We may disclose your health information to contractors, agents and other “business associates” who need the information in order to assist us with obtaining payment or carrying out our business operations. For example, we may share your health information with a billing company that helps us to obtain payment from your insurance company, or we may share your health information with an accounting firm or law firm that provides professional advice to us. If we do disclose your health information to a business associate, we will have a written contract to ensure that our business associate also protects the privacy of your health

information. If our business associate discloses your health information to a subcontractor or vendor, the business associate will have a written contract to ensure that the subcontractor or vendor also protects the privacy of the information.

4. Friends and Family Designated to be Involved In Your Care. If you do not object, we may share your health information with a family member, relative, or close personal friend who is involved in your care or payment for your care, including following your death.

5. Emergencies or Public Need.

Emergencies or As Required By Law. We may use or disclose your health information if you need emergency treatment or if we are required by law to treat you. We may use or disclose your health information if we are required by law to do so, and we will notify you of these uses and disclosures if notice is required by law.

Public Health Activities. We may disclose your health information to authorized public health officials (or a foreign government agency collaborating with such officials) so they may carry out their public health activities under law, such as controlling disease or public health hazards. We may also disclose your health information to a person who may have been exposed to a communicable disease or be at risk for contracting or spreading the disease if permitted by law. We may release some health information about you to your employer if your employer hires us to provide you with a physical exam and we discover that you have a work related injury or disease that your employer must know about in order to comply with employment laws.

Victims of Abuse, Neglect Or Domestic Violence. We may release your health information to a public health authority

authorized to receive reports of abuse, neglect or domestic violence.

Health Oversight Activities. We may release your health information to government agencies authorized to conduct audits, investigations, and inspections of our facilities. These government agencies monitor the operation of the health care system, government benefit programs such as Medicare and Medicaid, and compliance with government regulatory programs and civil rights laws.

Lawsuits and Disputes. We may disclose your health information if we are ordered to do so by a court or administrative tribunal that is handling a lawsuit or other dispute, subject to the limitations outlined elsewhere in this Notice. We may also disclose your information in response to a subpoena, discovery request, or other lawful request by someone else involved in the dispute, but only if required judicial or other approval or necessary authorization is obtained. SUD records, or testimony about their content, will NOT be used or disclosed in any civil, criminal, administrative, or legislative proceeding against you without your specific written consent for that proceeding or a court order. Any consent for such use/disclosure must be on a separate, stand-alone legal proceeding consent form and may not be combined with other authorizations.

Law Enforcement. We may disclose your health information to law enforcement officials for certain reasons, such as complying with court orders, assisting in the identification of fugitives or the location of missing persons, if we suspect that your death resulted from a crime, or if necessary, to report a crime that occurred on our property or off-site in a medical emergency, subject to the limitations outlined elsewhere in this Notice.

To Avert A Serious And Imminent Threat To Health Or Safety. We may use your health

information or share it with others when necessary to prevent a serious and imminent threat to your health or safety, or the health or safety of another person or the public. In such cases, we will only share your information with someone able to help prevent the threat. We may also disclose your health information to law enforcement officers if you tell us that you participated in a violent crime that may have caused serious physical harm to another person (unless you admitted that fact while in counseling), or if we determine that you escaped from lawful custody (such as a prison or mental health institution).

National Security and Intelligence Activities Or Protective Services. We may disclose your health information to authorized federal officials who are conducting national security and intelligence activities or providing protective services to the President or other important officials.

Military and Veterans. If you are in the Armed Forces, we may disclose health information about you to appropriate military command authorities for activities they deem necessary to carry out their military mission. We may also release health information about foreign military personnel to the appropriate foreign military authority.

Inmates and Correctional Institutions. If you are an inmate or you are detained by a law enforcement officer, we may disclose your health information to the prison officers or law enforcement officers if necessary to provide you with health care, or to maintain safety, security and good order at the place where you are confined. This includes sharing information that is necessary to protect the health and safety of other inmates or persons involved in supervising or transporting inmates.

Workers' Compensation. We may disclose your health

information for workers' compensation or similar programs that provide benefits for work-related injuries.

Coroners, Medical Examiners and Funeral Directors. In the event of your death, we may disclose your health information to a coroner or medical examiner. We may also release this information to funeral directors as necessary to carry out their duties.

Organ and Tissue Donation. In the event of your death or impending death, we may disclose your health information to organizations that procure or store organs, eyes or other tissues so that these organizations may investigate whether donation or transplantation is possible under applicable laws.

6. Completely De-identified or Partially De-identified Information. We may use and disclose your health information if we have removed any information that has the potential to identify you so that the health information is "completely de-identified." We may also use and disclose "partially de-identified" health information about you if the person who will receive the information signs an agreement to protect the privacy of the information as required by federal and state law. Partially de-identified health information will not contain any information that would directly identify you (such as your name, street address, social security number, phone number, fax number, electronic mail address, website address, or license number).

7. Incidental Disclosures. While we will take reasonable steps to safeguard the privacy of your health information, certain disclosures of your health information may occur during or as an unavoidable result of our otherwise permissible uses or disclosures of your health information. For example, during the course of a treatment session, other patients in the treatment area may see, or overhear discussion of, your health information.

8. Fundraising. We may use or disclose your demographic information, including, name, address, other contact information, age, gender, and date of birth, dates of health service information, department of service information, treating physician, outcome information, and health insurance status for fundraising purposes. With each fundraising communication made to you, you will have the opportunity to opt-out of receiving any further fundraising communications. We will also provide you with an opportunity to opt back in to receive such communications if you should choose to do so.

We will not use or disclose your SUD treatment records for fundraising unless you are provided a clear and conspicuous opportunity to opt out of receiving fundraising communications.

9. Changes to this Notice. We reserve the right to change this notice at any time and to make the revised or changed notice effective in the future. We will notify you of any changes.

Special rules for SUD Records:

We will not use or disclose your SUD treatment records for treatment, payment, or health care operations without your specific, written Part 2 consent, except as required or expressly allowed by law. Once provided, this consent may cover all such uses/disclosures until you revoke it in writing. We will not release SUD counseling notes except with a separate, specific consent.

If you provide a TPO consent, recipients are not required to segregate SUD records from other records in their systems, but all recipients are still prohibited from using SUD records in proceedings against you or redisclosing them without additional patient consent or court order except as allowed by law. Consent for legal proceedings must be on its own stand-alone form and not combined with other consents.

No SUD record will be used or disclosed in any legal, criminal, administrative, or legislative proceeding against you without your separate written consent for that proceeding, or a court order.

YOUR RIGHTS TO ACCESS AND CONTROL YOUR HEALTH INFORMATION

You have the following rights to access and control your health information:

1. Right To Inspect And Copy Records.

You have the right to inspect and obtain a copy of any of your health information that may be used to make decisions about you and your treatment for as long as we maintain this information in our records, including medical and billing records. To inspect or obtain a copy of your health information, please submit your request in writing to the Privacy Officer. If you request a copy of the information, we may charge a fee for the costs of copying, mailing or other supplies we use to fulfill your request. If you would like an electronic copy of your health information, we will provide you a copy in electronic form and format as requested as long as we can readily produce such information in the form requested. Otherwise, we will cooperate with you to provide a readable electronic form and format as agreed.

2. Right To Amend Records.

If you believe that the health information we have about you is incorrect or incomplete, you may ask us to amend the information for as long as the information is kept in our records by writing to us. Your request should include the reasons why you think we should make the amendment. If we deny part or all of your request, we will provide a written notice that explains our reasons for doing so. You will have the right to have certain information related to your requested amendment included in your records.

3. Right To An Accounting Of Disclosures. You have a right to request an “accounting of disclosures,” which is a list with information about how we have shared your health information with others. To obtain a request form for an accounting of disclosures, please write to the Privacy Officer. You have a right to receive one list every 12-month period for free. However, we may charge you for the cost of providing any additional lists in that same 12-month period.

4. Right to Receive Notification of a Breach. You have the right to be notified if there is a probable compromise of your unsecured protected health information within sixty (60) days of the discovery of the breach. The notice will include a description of what happened, including the date, the type of information involved in the breach, steps you should take to protect yourself from potential harm, a brief description of the investigation into the breach, mitigation of harm to you and protection against further breaches and contact procedures to answer your questions.

We are required by law to notify you and affected patients if a breach of your SUD records occurs, using plain language and meeting all requirements of 42 C.F.R. Part 2 and the HIPAA Breach Notification Rule.

5. Right To Request Restrictions. You have the right to request that we further restrict the way we use and disclose your health information to treat your condition, collect payment for that treatment, run our normal business operations or disclose information about you to family or friends involved in your care. You also have the right to request that your health information not be disclosed to a health plan if you have paid for the services in full, and the disclosure is not otherwise required by law. The request for restriction will only be applicable to that particular service. You will have to request a restriction for each service thereafter. To request restrictions,

please write to the Privacy Officer. We are not required to agree to your request for a restriction, and in some cases the restriction you request may not be permitted under law. However, if we do agree, we will be bound by our agreement unless the information is needed to provide you with emergency treatment or comply with the law. Once we have agreed to a restriction, you have the right to revoke the restriction at any time. Under some circumstances, we will also have the right to revoke the restriction as long as we notify you before doing so.

6. Right To Request Confidential Communications. You have the right to request that we contact you about your medical matters in a more confidential way, such as calling you at work instead of at home, by notifying the registration associate who is assisting you. We will not ask you the reason for your request, and we will try to accommodate all reasonable requests.

7. Right To Have Someone Act On Your Behalf. You have the right to name a personal representative who may act on your behalf to control the privacy of your health information. Parents and guardians will generally have the right to control the privacy of health information about minors unless the minors are permitted by law to act on their own behalf.

8. Right To Obtain A Copy Of Notices. If you are receiving this notice electronically, you have the right to a paper copy of this notice. We may change our privacy practices from time to time. If we do, we will revise this notice and post any revised notice in our registration area and/or on our website.

9. Right To File A Complaint. If you believe your privacy rights have been violated, you may file a complaint with us by calling the Privacy Officer at 978.774.0774 or with the Secretary of the Department of Health and Human Services. The medical practice will not

withhold treatment or take action against you for filing a complaint. We will not retaliate against you for filing a complaint.

10. Use and Disclosures Where Special Protections May Apply. Some kinds of information, such as HIV/AIDS-related information, mental health treatment information, sexually transmitted disease information, family planning and genetic testing information, are considered so sensitive that state or federal laws provide special protections for them. Therefore, some parts of this general Notice of Privacy Practices may not apply to these types of information. If you have questions or concerns about the ways these types of information may be used or disclosed, please speak with your health care provider. SUD records are governed by specific federal law (42 C.F.R. Part 2) that provides special protections.

11. Special Rights for SUD Records

You have additional rights specifically for SUD records, including:

- The right to request restrictions on SUD disclosures for TPO.
- The right to request an accounting of all SUD disclosures with consent for up to three years, and to obtain a list of SUD disclosures by intermediaries for the last three years.
- The right to opt out of fundraising communications related to SUD services.
- The right to file a complaint with NAFI and/or the Secretary of HHS if you believe your SUD privacy rights are violated.
- You will not be retaliated against or required to waive complaint rights to receive care, coverage, or payment.
- The right to receive a copy of this notice in paper or electronic form.

Patient Plate – Office Use Only

Medical Record Number: _____

**North American Family Institute, Inc.
ACKNOWLEDGMENT AND CONSENT**

By signing below, I acknowledge that I have been provided a copy of this Notice of Privacy Practices and have therefore been advised of how health information about me may be used and disclosed by the medical practice listed at the beginning of this notice, and how I may obtain access to and control of this information. I also acknowledge and understand that I may request copies of separate notices explaining special privacy protections that apply to HIV/AIDS-related information, sexually transmitted disease information, alcohol and substance use disorder treatment information, mental health treatment information, family planning and genetic testing information from my health care provider. Finally, by signing below, I consent to the use and disclosure of my health information to treat me and arrange for my medical care, to seek and receive payment for services given to me, and for the business operations of NAFI, its staff, and its business associates.

Signature of Patient or Personal Representative

Print Name of Patient or Personal Representative

Date

Description of Personal Representative's Authority