WHOLE PATH PSYCHIATRY AND WELLNESS PLLC

Your Information. Your Rights. Our Responsibilities.

NOTICE OF PRIVACY PRACTICES

Effective date: October 1, 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.

Your Rights

You have the right to:

- Get a copy of your paper or electronic medical record.
- Ask us to correct your paper or electronic medical record.
- Request confidential communications.
- Ask us to limit the information we use or share.
- Get a list of certain disclosures of your information.
- Get a copy of this privacy notice.
- Choose someone to act for you.
- File a complaint if you believe your privacy rights have been violated.

Your Choices

You have some choices in the way that we use and share information as we:

- Share information with family, close friends, or others involved in your care or payment for your care.
- Respond to disaster-relief situations, when applicable.
- Provide information for certain directory purposes, if applicable. Whole Path Psychiatry and Wellness PLLC is an outpatient telehealth practice and does not operate a hospital directory.

We do not sell your personal health information or use or disclose it for marketing purposes without the written authorization required by law. We do not conduct fundraising activities using patient information.

For certain information, including records protected by 42 CFR Part 2, additional consent and confidentiality requirements may apply. These are described below.

Our Uses and Disclosures

We may use and share your information as we:

- Treat you.
- Run our organization.
- Receive payment for your services.
- Help with public health and safety issues.
- Conduct or support health research, when permitted by law.
- Comply with the law.
- Respond to organ and tissue donation requests, when applicable.
- Work with a medical examiner or funeral director, when applicable.
- Address workers' compensation, law enforcement, and other government requests, when permitted by law.
- Respond to lawsuits and legal actions, when permitted by law.

Special protections for certain substance use disorder records: If we receive or maintain substance use disorder patient records protected by 42 CFR Part 2, we will handle those records in accordance with applicable Part 2 requirements. We will not use or disclose Part 2-protected records in civil, criminal, administrative, or legislative proceedings against you unless you provide the consent required by Part 2 or a court order and subpoena satisfy Part 2. A subpoena alone does not authorize disclosure of Part 2-protected records for these proceedings.

How do we typically use or share your health information?

Treat you

We can use your health information and share it with other professionals who are treating you, as permitted by applicable law.

Example: With appropriate permission or another legal basis, we may coordinate with another clinician involved in your care.

Run our organization

We can use and share health information as needed to operate our practice, support quality and safety, manage our electronic health record and patient portal, and contact you about your care.

Example: We use health information to manage your treatment, maintain clinical records, schedule appointments, and support the secure operation of our practice.

Receive payment for your services

Whole Path Psychiatry and Wellness PLLC currently operates on a private-pay basis. We may use information to prepare invoices, process payments, maintain payment records, and provide receipts or superbills when requested. We do not routinely submit claims to health plans on your behalf. If our payment practices change, we will update this notice as required.

If you choose to submit a superbill to an insurance plan yourself, you will be sharing the information contained in that superbill with the plan. We do not control how the plan uses information after you submit it.

How else can we use or share your health information?

We are allowed or required to share your information in other ways, usually in ways that contribute to public health and safety or comply with legal obligations. We must meet conditions in the law before sharing information for these purposes. More protective rules may apply to mental health information and to records protected by 42 CFR Part 2.

Help with public health and safety issues

We can share health information for certain situations, as permitted or required by law, such as:

- Preventing disease.
- Helping with product recalls.
- Reporting adverse reactions to medications.
- Reporting suspected abuse, neglect, or domestic violence when legally required or permitted.
- Preventing or reducing a serious threat to anyone’s health or safety.

Do research

We can use or share your information for health research when permitted by law and applicable privacy safeguards.

Comply with the law

We will share information about you if state or federal laws require it, including with the U.S. Department of Health and Human Services if it wants to see that we are complying with federal privacy law.

Respond to organ and tissue donation requests

If applicable, we may share health information with organ procurement organizations as permitted by law.

Work with a medical examiner or funeral director

If applicable, we may share health information with a coroner, medical examiner, or funeral director when an individual dies, as permitted by law.

Address workers’ compensation, law enforcement, and other government requests

We can use or share health information about you:

- For workers' compensation claims, as permitted by law.
- For law enforcement purposes or with a law enforcement official, when legally permitted or required.
- With health oversight agencies for activities authorized by law.
- For special government functions, such as military, national security, and presidential protective services, when applicable and legally permitted.

Respond to lawsuits and legal actions

We can share health information about you in response to a court or administrative order, or in response to a subpoena, when the disclosure is permitted by applicable law. Additional restrictions apply to Part 2-protected records, as explained in this notice.

Your Rights in More Detail

Get an electronic or paper copy of your medical record

- You can ask to see or get an electronic or paper copy of your medical record and other health information we have about you. Contact us using the information at the end of this notice.
- We will provide a copy or a summary of your health information, usually within 30 days of your request. We may charge a reasonable, cost-based fee as permitted by law.

Ask us to correct your medical record

- You can ask us to correct health information about you that you think is incorrect or incomplete. Contact us to make the request.
- We may say no to your request, but we will tell you why in writing within 60 days, as required by law.

Request confidential communications

- You can ask us to contact you in a specific way (for example, by cell phone, email, or through the patient portal) or to send communications to a different address.
- We will accommodate reasonable requests as required by law.

Ask us to limit what we use or share

- You can ask us not to use or share certain health information for treatment, payment, or our operations. We are not required to agree to your request, except where the law requires otherwise. If we agree, we will comply with the restriction, subject to applicable legal exceptions.
- If you pay for a service or health care item out of pocket in full, you can ask us not to share information about that service with your health insurer for payment or health care operations purposes. We will agree unless a law requires us to share that information.

Get a list of those with whom we've shared information

- You can ask for a list (accounting) of certain disclosures of your health information for the six years before the date of your request.
- The accounting will not include disclosures for treatment, payment, and health care operations, and certain other disclosures excluded by law. We will provide one accounting in a 12-month period for free and may charge a reasonable, cost-based fee for additional requests within that period.

Get a copy of this privacy notice

You can ask for a paper copy of this notice at any time, even if you agreed to receive it electronically. We will provide a paper copy promptly.

Choose someone to act for you

- If someone has legal authority to act as your personal representative, such as a person with your health care power of attorney or a legal guardian, that person may exercise your rights and make choices about your health information to the extent allowed by law.
- We will verify the person's authority before taking action.

File a complaint if you feel your rights are violated

- You can complain to us using the contact information at the end of this notice.
- You can also file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting https://www.hhs.gov/hipaa/filing-a-complaint/index.html.
- We will not retaliate against you for filing a complaint.

Additional Information About Your Choices

For certain health information, you can tell us your choices about what we share. If you have a clear preference for how we share your information in the situations described below, contact us. We will follow your instructions when the law requires or permits us to do so.

In these cases, you have the right and choice to tell us whether to:

- Share information with your family, close friends, or others involved in your care or payment for your care.
- Share information in a disaster-relief situation, when applicable.

If you are not able to tell us your preference, for example if you are unconscious, we may share information if we believe it is in your best interest and the law permits. We may also share information when needed to lessen a serious and imminent threat to health or safety, as permitted by law.

In these cases, we will not share your information unless you give us written permission, when required by law:

- Marketing purposes that require authorization.
- Sale of your information.
- Most uses and disclosures of psychotherapy notes.

Whole Path Psychiatry and Wellness PLLC does not use patient information for fundraising. If this practice changes, we will update this notice and provide any choices or notices required by law.

Part 2-protected records: If we maintain records protected by 42 CFR Part 2, additional rules may apply to the use and disclosure of those records, including requirements for written consent for certain disclosures, restrictions on use in proceedings against you, and special rules for fundraising and redisclosure. We will provide any additional notice or choice required by law.

Substance Use Disorder Records Protected by 42 CFR Part 2

Some substance use disorder records are protected by federal confidentiality regulations at 42 CFR Part 2. Not every record that mentions substance use is a Part 2 record. Whether a record is protected depends on the source of the record and the requirements of federal law.

Whole Path Psychiatry and Wellness PLLC may assess substance use as part of psychiatric care and may receive records from outside substance use disorder treatment providers. When we receive records that are protected by Part 2, we will identify and handle them in accordance with applicable federal requirements, including any restrictions or conditions attached to the consent or other legal basis under which the records were disclosed.

We will not use or disclose Part 2-protected records in civil, criminal, administrative, or legislative proceedings against you unless you provide the consent required by Part 2 or a court order and subpoena satisfy Part 2. Part 2-protected records may also be subject to additional consent requirements for uses and disclosures for treatment, payment, and health care operations. We will follow the requirements that apply to the particular records and disclosure.

When Part 2 requires a notice restricting further use or disclosure, we will include that notice with the disclosure. A person who receives Part 2-protected records may not further use or disclose them except as permitted by Part 2.

If Whole Path's services or status change in a way that makes it a Part 2 program, we will update our privacy practices and provide any separate or combined Part 2 patient notice required by law.

Our Responsibilities

- We are required by law to maintain the privacy and security of your protected health information.
- We will let you know promptly if a breach occurs that may have compromised the privacy or security of your information, as required by law.
- We must follow the duties and privacy practices described in this notice and give you a copy of it.

- We will not use or share your information other than as described in this notice unless you tell us we can in writing or the law otherwise permits or requires the use or disclosure. If you authorize a use or disclosure, you may change your mind at any time by notifying us in writing, except to the extent we have already acted in reliance on your authorization.
- We will apply additional protections to records subject to 42 CFR Part 2 and other applicable confidentiality laws.

Whole Path Psychiatry and Wellness PLLC — Practice-Specific Information

Whole Path Psychiatry and Wellness PLLC provides outpatient psychiatric services, including psychiatric evaluations and medication management, to adults in Massachusetts through telehealth. Our services may include assessment and treatment of co-occurring substance use concerns within the scope of our psychiatric practice, as well as coordination of care with outside treatment providers.

Whole Path Psychiatry and Wellness PLLC currently operates on a private-pay basis. We may use information to collect payment, process transactions, maintain payment records, and provide receipts or superbills when requested. We do not routinely submit claims to health plans on your behalf. We may update our payment practices in the future, including if we participate with health plans.

We use a patient portal and electronic practice systems to support scheduling, communication, telehealth services, payment, and clinical recordkeeping. We use service providers that perform functions on our behalf, when applicable, under agreements and safeguards required by law.

We do not sell personal health information and do not use or disclose it for marketing purposes without the written authorization required by law.

We will comply with applicable Massachusetts confidentiality laws and professional confidentiality obligations. Certain mental health information may receive additional protections under state law. When a more protective state or federal law applies, we will follow that law. The specific circumstances in which information may be disclosed without written authorization depend on the law that applies to the information and the circumstances.

When we receive records protected by 42 CFR Part 2, we will handle those records in accordance with applicable federal confidentiality requirements. The fact that Whole Path Psychiatry and Wellness PLLC evaluates or documents substance use concerns, or receives records from another provider, does not by itself determine whether Whole Path Psychiatry and Wellness PLLC is a Part 2 program. That determination depends on the applicable federal definitions and the practice's actual services and circumstances.

Changes to the Terms of This Notice

We can change the terms of this notice, and the changes will apply to all health information we maintain about you. The current notice will be available upon request and on our website. We will provide notice of material changes as required by law.

Contact Us

For questions about this notice, to request a copy of your record, to exercise your privacy rights, or to file a complaint with Whole Path, contact:

Privacy contact: Emily Gregonis, MSN, PMHNP-BC

Practice: Whole Path Psychiatry and Wellness PLLC

Phone: 617-341-9088

Email: emily.gregonis@wholepathpsych.org