

# Consumer Health Data Privacy Policy

## Washington My Health My Data Act Disclosures

**Effective Date:** May 8, 2026

**Last Updated:** May 8, 2026

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## Purpose of This Policy

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This Consumer Health Data Privacy Policy is provided in compliance with Washington’s My Health My Data Act, RCW 19.373 (“MHMDA”). It describes how HIDEF Physical Therapy and HIDEF Sports & Physical Therapy (collectively, “HIDEF,” “we,” “our,” or “us”) collect, use, share, and protect consumer health data about Washington consumers.

This Policy is separate from:

- Our **Website Privacy Policy**, which covers general Site information collection
- Our **Notice of Privacy Practices**, which covers protected health information (“PHI”) under HIPAA

Some information about you may be governed by more than one of these documents. Where MHMDA and HIPAA overlap, HIPAA generally controls information collected and used in the course of treatment, payment, and healthcare operations as a HIPAA-covered entity. This Policy applies to consumer health data that is not governed by HIPAA – for example, information collected through the Site before you become a patient.

## 1. What Is “Consumer Health Data”?

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Under MHMDA, consumer health data is personal information that is linked or reasonably linkable to a consumer and that identifies the consumer’s past, present, or future physical or mental health status. This can include:

- The fact that you visited or interacted with our Site
- Information you submit through appointment requests, contact forms, or callback requests that relates to a health condition, body part, symptom, treatment, or service
- Inferences drawn from your activity that reveal or are used to associate you with a health condition
- Precise geolocation information that could identify a visit to a healthcare provider
- Biometric data, where collected

## 2. Categories of Consumer Health Data We Collect

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We may collect the following categories of consumer health data:

Category	Examples
Identifiers tied to health context	Name, email, phone number when submitted in connection with a service request
Health-related inquiries	The condition, body part, sport, or service you reference in a contact form
Site activity tied to health context	Pages viewed (e.g., “ACL Recovery,” “Pelvic Health”), forms started or submitted
Appointment-related information	Requested location, requested provider, reason for visit
Precise geolocation	Only when you affirmatively share location to find a clinic; we do not passively track precise location

We do not collect biometric data through the Site. Biometric data collected during clinical care (e.g., force plate data, dynamometry) is governed by our Notice of Privacy Practices.

## 3. Sources of Consumer Health Data

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We collect consumer health data from:

- **You directly**, through the Site, phone calls, or email
- **Your device**, through cookies and analytics tools you have consented to
- **Referring providers**, when they refer you for care (this information typically becomes PHI on receipt and is governed by our Notice of Privacy Practices)

## 4. How We Use Consumer Health Data

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We use consumer health data only for the following purposes:

- Responding to your inquiries and scheduling appointments
- Verifying eligibility, insurance, and clinical fit before your first visit
- Improving our Site, services, and patient communications in aggregate
- Complying with legal obligations
- Detecting, preventing, and responding to security incidents and fraud

**We do NOT use consumer health data for targeted advertising. We do NOT sell consumer health data.**

## 5. With Whom We Share Consumer Health Data

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We share consumer health data only with the following categories of recipients, and only as needed to provide services to you or comply with law:

Recipient Category	Purpose
Service providers (Wix, Google Analytics, communications vendors)	Operate the Site, analyze aggregate traffic, manage communications
Healthcare clearinghouses and insurance carriers	Verify benefits and process claims (only after you become a patient – governed by HIPAA)
Legal authorities	When required by law, subpoena, or court order
Successor entities	In the event of a merger, acquisition, or sale of assets

We do not share consumer health data with advertisers, data brokers, or social media platforms.

## 6. Sale of Consumer Health Data

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**HIDEF does not sell consumer health data.**

Under MHMDA, “sale” means the exchange of consumer health data for monetary or other valuable consideration. We do not engage in such exchanges. If our practices ever change, we will obtain a separate, valid written authorization from you before any sale, as required by RCW 19.373.030.

## 7. Your Rights Under MHMDA

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As a Washington consumer, you have the following rights regarding your consumer health data:

### A. Right to Confirm and Access

You have the right to confirm whether we are collecting, sharing, or selling your consumer health data, and to access that data.

## B. Right to Withdraw Consent

You have the right to withdraw consent for our collection and sharing of your consumer health data at any time. Withdrawal does not affect the lawfulness of processing that occurred before withdrawal.

## C. Right to Delete

You have the right to request deletion of your consumer health data. We will honor deletion requests and notify any affiliates, processors, contractors, or third parties with whom we have shared the data, who must also delete it (subject to limited exceptions under MHMDA).

## D. Right to Appeal

If we deny your request, you may appeal that denial. We will respond to appeals within 45 days. If we deny your appeal, you may file a complaint with the Washington State Attorney General at <https://www.atg.wa.gov/file-complaint>.

# 8. How to Exercise Your Rights

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To exercise any right under this Policy, contact us using one of the methods below. We will not require you to create an account in order to make a request.

**Email: [business@hidefpt.com](mailto:business@hidefpt.com) HIDEF Physical Therapy Attn: W. Zach Smith, Privacy Officer – Consumer Health Data 17709 SE 272nd St Suite C Covington, WA 98042**

We will:

- Acknowledge your request within 10 business days
- Respond substantively within 45 days (extendable by an additional 45 days where reasonably necessary, with notice to you)
- Verify your identity using information already on file or, where necessary, additional information you provide
- Notify you of our decision and, if denied, your right to appeal

There is no fee for the first request in any 12-month period. We may charge a reasonable fee for additional or excessive requests, or decline to act, as permitted by MHMDA.

# 9. Data Security

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We protect consumer health data using reasonable administrative, technical, and physical safeguards, including encryption in transit, access controls, vendor due diligence, and employee

training. We limit access to consumer health data to personnel who need it to perform their duties.

## **10. Changes to This Policy**

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We may update this Policy from time to time. Material changes will be posted on the Site with an updated “Last Updated” date. We will provide additional notice as required by MHMDA.

## **11. Contact**

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**W. Zach Smith, Privacy Officer HIDEF Physical Therapy 17709 SE 272nd St Suite C  
Covington, WA 98042 Email: [business@hidefpt.com](mailto:business@hidefpt.com) To file a complaint with the  
Washington State Attorney General: <https://www.atg.wa.gov/file-complaint>**

*HIDEF Physical Therapy — The Best Is Ahead*