

POLICY

Policy #	GM-15
Effective:	October 30, 2024
Revised:	May 19, 2025

SUBJECT: **Privacy Policy**

POLICY STATEMENT:

Compass Coordination, Inc. is committed to protecting your privacy while providing you with a positive experience on our website.

APPLICABILITY:

This Privacy Notice ("**Notice**") explains our privacy practices and provides information on how and why we collect, use and share your personal information through our interaction with you in relation to our services and when you visit our website, ("**Website**"). The Notice also describes choices that may be available to you regarding use, access, deletion and correction of your personal information.

Additional information on our personal information practices may be provided in supplemental terms and conditions, supplemental privacy statements, or notices provided prior to or at the time of data collection.

PROCEDURES:

HOW WE COLLECT YOUR PERSONAL INFORMATION

- We collect your personal information when you actively provide it to us through your interactions with us.
- We may automatically collect personal information from you as you visit our Websites as a user or a participant, including recording communications, when enabled.
- We may infer or derive personal information based on other information we collect, such as with Service features that provide conversational intelligence.

WHAT PERSONAL INFORMATION WE COLLECT

Personal Information you actively provide to us or we collect from third parties, business partners, other users, and service providers

Your Contact Information/Identifiers:

- Name, email address.

Personal information we collect through your interactions with Compass Coordination.

- Name, email address, phone number

Participant content:

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- Files, any content of communication or other information you or another participant upload, provide, grant access to or otherwise implement.

*Note that users and participants control the content that they provide, and it may include any category of personal information.

Recordings:

- A user hosting a phone or video conferencing meeting may choose to record the session, and if so, the host is responsible for obtaining any required consent from you.
- As with all user content, recordings may contain personal data and may be stored with Compass Coordination at the request of the meeting host. A meeting host may choose to store a recording of a meeting on the host's local storage device, not with Compass Coordination. When a host chooses to do that, Compass Coordination does not have any control over the recording. Transcripts, which may also contain personal data, are treated the same way as recordings.
- Compass Coordination may access or use the recording or transcripts stored with us as requested by the host or customer (such as providing technical support), to improve our Services, or as otherwise permitted by our agreement with the customer.

SMS messages:

- Content of blocked SMS messages that violate our spam rules.

Inferred or derived data:

- Inferred or derived data may include a summary of information included in recorded content processed by conversational intelligence. Users and participants control the content they provide.

Your communications with us:

- Surveys, calls (including recordings), emails and messages, etc.

Other information:

- Any personal information that a user or guest voluntarily provides about an individual through their use of the Services, including synchronizing contact information, or through integrations with other applications.

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HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for the following purposes: Communicate with you; Verify your identity to prevent fraud in compliance with applicable law.

HOW, WHY, AND WHAT PERSONAL INFORMATION WE SHARE WITH THIRD PARTIES

We may share and disclose your personal information (as identified in the section What Personal Information We Collect solely for legitimate business or legal purposes as described in this Notice and in accordance with applicable law, with the following third parties:

- Business partners to facilitate our Services;
- Service providers, contractors, vendors or agents who operate on our behalf to:
 - Operate, deliver, improve and customize our Websites, Apps, and Services;
 - Provide support and technical services;
 - Enforce our acceptable use policy;.
- Law enforcement agencies, regulatory or governmental bodies, or other third parties in order to respond to legal process, comply with any legal obligation; protect or defend our rights, interests or property or that of third parties; or prevent or investigate wrongdoing in connection with the Website or our Services; and/or
- Other third parties with your consent.

SMS opt-in or phone numbers for SMS are not being shared with third parties and affiliate companies for marketing purposes.

HOW WE RESPECT YOUR PRIVACY RIGHTS

We provide you with the opportunity to access, review, modify, and delete your personal information that we process.

Requests from End Users regarding personal information we process on behalf of our Customers as a Data Processor

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In general, when processing the content of communications such as voicemails, faxes, recordings etc. in connection with our Services, we do so on behalf of our Customers and in accordance with their instructions.

We will not share your personal information with third parties for the third parties' direct marketing purposes.

Unsubscribe from our mailing list

You can manage your communication preferences through the following method:

- Sending us an email at administration@compasstn.org

HOW WE KEEP YOUR PERSONAL INFORMATION SECURED

Keeping your information secure is important to us. We have taken appropriate steps designed to reduce the risk that your personal information may be subject to loss, misuse, unauthorized access, disclosure, alteration or destruction.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We will retain your personal information for no longer than is necessary to fulfill the purposes for which the information was originally collected unless a longer retention period is required or permitted by law, for legal, tax or regulatory reasons, or other legitimate and lawful business purposes.

Where we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it.

Individual rights to access and to limit use and disclosure

Please see the relevant section in this Notice How We Respect Your Privacy Rights for information regarding how individuals can exercise their rights to access their personal data and to limit the use and disclosure of their personal data.

SMS Terms & Conditions

1- SMS Consent Communication:

Information, including Phone Numbers, obtained as part of the SMS consent process will not be shared with third parties and affiliate companies for marketing purposes.

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2- Types of SMS Communications:

If you have consented to receive text messages from Compass Coordination, Inc., you may receive messages related to the following :

- Appointment reminders
- Follow-up messages

Example: "Hello, this is your support coordinator. We spoke last week and set tomorrow as the date for my visit. I just wanted to remind you that I am still planning to visit tomorrow. Reply STOP to opt out of SMS messaging at any time."

3- Message Frequency:

Message frequency may vary depending on the type of communication. Example: Message frequency may vary. You may receive up to 1 SMS messages per week related to the next scheduled visit by your support coordinator."

Example:

"Message frequency may vary. You may receive up to 1 SMS messages per week regarding your appointments or account status."

4- Potential Fees for SMS Messaging:

Please note that standard message and data rates may apply, depending on your carrier's pricing plan. These fees may vary if the message is sent domestically or internationally.

5- Opt-In Method:

You may opt-in to receive SMS messages from Compass Coordination, Inc. in the following ways:

- Verbally, during a conversation

6- Opt-Out Method:

You can opt out of receiving SMS messages at any time. To do so, simply reply "STOP" to any SMS message you receive. Alternatively, you can contact us directly to request removal from our messaging list.

7- Help:

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If you are experiencing any issues, you can reply with the keyword HELP. Or, you can get help directly from us at www.compasstn.org.

8- Standard Messaging Disclosures:

- Message and data rates may apply.
- You can opt-out at any time by texting "STOP."
- For assistance, text "HELP" or visit our Privacy Policy and Terms and Conditions pages.
- Message frequency may vary.

UPDATES TO THIS NOTICE

We may update this Notice from time to time in response to changing legal, technical, or business developments. If we make changes to our Notice, we will post those changes on this page in addition to updating the "Last Updated" or effective date at the top of this webpage. If we make material changes, we will notify you either by emailing you or by posting a notice of such changes prominently on this page prior to such material changes taking effect.

CONTACT US

If you have any questions, comments or concerns about this Notice, please e-mail our data protection officer at administraton@compasstn.org. Or, you can write to us at:

Compass Coordination, Inc.
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Nashville, TN 37217.