

Consumer Health Data Privacy Policy

This Washington Consumer Health Data Privacy Policy ("Policy") applies to personal data defined as "Consumer Health Data" by the Washington My Health My Data Act ("MHMDA") that is collected from you by Megan Rosenberg, PLLC ("Megan Rosenberg, PLLC," "I," "me," or "my"). I am the sole owner and practitioner of Megan Rosenberg, PLLC. This Policy supplements my Notice of Privacy Practices and other client consent and disclosure forms. This Policy applies specifically to Consumer Health Data regulated under the Washington My Health My Data Act. For the purposes of this Policy, unless otherwise noted, all references to Megan Rosenberg, PLLC include my practice website meganrosenbergpllc.com, my client intake, scheduling, and EHR platform (PracticeQ/IntakeQ), my telehealth and phone communication platform (Zoom), and other interactions through which Consumer Health Data may be collected, regardless of whether the underlying counseling session is provided under my Washington LMHC license or my Montana LCPC license.

Consumer Health Data under MHMDA means 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. Much of the health information collected as part of counseling services is protected under HIPAA, Washington health care privacy laws, and professional licensing requirements rather than MHMDA. This Policy explains how my practice handles information that may fall under MHMDA. This Policy does not apply where an exception or exemption applies, such as to Protected Health Information ("PHI") under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), or to health care information governed by Washington's Uniform Health Care Information Act (chapter 70.02 RCW). As a licensed mental health private practice, most of the clinical data I collect and use — including your treatment records, clinical notes, and diagnostic information — is excluded from MHMDA because it is regulated under HIPAA, chapter 70.02 RCW, and my professional licensing obligations under RCW 18.225 and ARM 24.219. See the Disclosure and Informed Consent for Treatment document you received at intake, and my Notice of Privacy Practices, for disclosures about that personal information.

Consumer Health Data We Collect

The personal data I collect depends on the context of your interactions with me, the choices you make, the tools you use, your location, and applicable law. Consumer Health Data is broadly defined, and some categories of data I collect would be Consumer Health Data if they were not excluded from MHMDA.

I may collect the following categories of personal information, which may be Consumer Health Data if not excluded from MHMDA:

- Information about your mental or behavioral health-related conditions, symptoms, status, or treatment history that you provide through intake forms, appointment requests, or communications with me before a formal client relationship is established;
- Information submitted through an open text field not directly related to treatment, such as a general inquiry or contact form on my website;
- Internet or Network Activity Information essential to running my website, such as your Internet Protocol (IP) address, browser type and version, and pages viewed, which could indicate your attempt to seek counseling services or information about mental health; and
- Other information that may be used to infer or derive data related to the above.

These categories of personal information are specifically excluded from MHMDA when collected by me as part of providing clinical treatment. Examples of data I collect that are excluded from MHMDA include:

- Personal data defined as Protected Health Information ("PHI") under HIPAA, to the extent applicable;
- Health care information collected, used, or disclosed in treatment records under Washington's Uniform Health Care Information Act (chapter 70.02 RCW);
- Clinical records and disclosures governed by my professional licensing obligations under RCW 18.225 (Washington) and ARM 24.219 (Montana);
- Information and documents used only for my internal quality-of-care review; and
- Information that is de-identified, and information derived from such de-identified data.

Sources of Consumer Health Data

I do not collect your Consumer Health Data unless you voluntarily provide it to me. I collect personal information, including Consumer Health Data, from the following categories of sources:

- Directly from you, when you complete an intake or appointment request form, use my secure client portal, send me a secure message, communicate with me by phone, email, fax, or text, or otherwise interact with my practice.
- Through PracticeQ, the platform I use as my Electronic Health Record (EHR), scheduling system, secure client messaging portal, payment processor, and fax service. PracticeQ also sends Zoom video invitations to clients on my behalf for scheduled telehealth appointments.
- Through Zoom, which I use for telehealth video sessions and for a dedicated Zoom phone line I use for calls and voicemail with clients.
- Through physical mail sent to or received from you, including documents mailed to my business PO Box.
- From my website, and automatically from devices you use to visit it, such as browser and device information collected through standard website analytics.

Use of Your Consumer Health Data

In general, I do not use Consumer Health Data as defined by MHMDA, because the personal data I use in connection with clinical treatment is specifically excluded from MHMDA. Those other uses of your personal data are described in the Disclosure and Informed Consent for Treatment document and my Notice of Privacy Practices.

To the extent I collect personal information, including Consumer Health Data, as described above, I may use it for the following purposes:

- To provide you with the counseling services you have requested;
- Scheduling appointments, sending appointment reminders, and other administrative communications;
- Processing payments, including automatic charges to a payment card kept on file, where authorized by you;
- Ensuring the secure and reliable operation of my EHR, client portal, telehealth platform, and website;
- Essential business operations that support my practice, such as billing, recordkeeping, and complying with my legal and licensing obligations in Washington and Montana; and
- Other purposes for which I give you choices or obtain your consent as required by law.

I do not sell Consumer Health Data, and I do not use geofencing technology to identify, track, or send communications to individuals seeking mental health care services.

How I Store Your Information

Clinical and Consumer Health Data I collect is stored within the PracticeQ EHR platform, which maintains

its own security and encryption safeguards, and on password-protected devices used exclusively by me in the course of my practice. Physical documents are mailed using the United States Postal Service, and physical mail sent to my practice is received at my business PO Box.

Sharing Consumer Health Data with Third Parties

I will only share your Consumer Health Data with trusted service providers and only for the services you have requested, or to the extent necessary to comply with applicable law. All such third parties are prohibited from using your Consumer Health Data except to provide services to me, and they are required to maintain the confidentiality of your Consumer Health Data.

As necessary for the purposes described above, I may share personal information, including Consumer Health Data, with the following categories of third parties:

- **PracticeQ.** My EHR, scheduling, secure messaging, payment processing, and fax service provider. PracticeQ processes and stores Consumer Health Data on my behalf and sends scheduling and Zoom video invitations to clients.
- **Zoom.** My telehealth video and phone communication provider, used for video sessions and a dedicated practice phone line.
- **Professional consultants.** As described in my Disclosure and Informed Consent for Treatment document, I may consult with other licensed mental health professionals for clinical consultation purposes; identifying information is minimized and protected in these consultations.
- **Payment processors.** When you make a payment, payment and transactional data is disclosed to the payment processor integrated with PracticeQ as necessary for payment processing.
- **Government agencies.** I disclose data to government agencies, licensing boards, or law enforcement when required by law, such as mandatory reporting obligations, a valid court order, or a licensing investigation, as described in my Disclosure and Informed Consent for Treatment document.
- **Other third parties.** In limited circumstances, it may be necessary to provide data to other third parties to comply with the law or to protect my rights or those of my clients.

Your Rights and How to Exercise Them

You have certain rights under MHMDA, including the right to access, delete, or withdraw consent relating to your Consumer Health Data, subject to certain exceptions. You may exercise any of these rights by submitting a written request using the contact details found at the end of this Policy. Your request must include:

- Your full name and contact information;
- A description of the right you wish to exercise;
- Sufficient information to allow me to verify your identity; and
- Any additional details that will help me respond to your request.

I will respond to your verified request within 45 days. If your request to exercise a right under MHMDA is denied, you may appeal that decision within 30 days by responding to the denial with a written request for an appeal. Your appeal must include:

- A copy of the original decision;
- A clear explanation of why you believe the denial was incorrect; and
- Any supporting documentation.

I will respond to your appeal within 45 days. If your appeal is denied, I will provide you with a written explanation of the reasons for the decision. If your appeal is unsuccessful, you can raise a concern or lodge a complaint with the Washington State Attorney General at www.atg.wa.gov/file-complaint.

Changes to This Policy

I reserve the right to change this Policy from time to time, for example, when there are changes in my services, my data protection practices, or the law. When changes to this Policy are material, I will inform you by posting a notice on my website and updating the "Last Updated" date below.

Contact Information

If you have questions about this Policy or wish to exercise your rights under MHMDA, please contact me at:

Megan Rosenberg, LMHC, LCPC Owner, Megan Rosenberg, PLLC Mailing Address: PO Box 66, Moses Lake, WA 98837 Physical Office Address: 1021 W. Broadway Ave., Moses Lake, WA 98837 Phone: (406) 369-7700 Email: megan@meganrosenbergpllc.com

Last Updated: July 16, 2026

Client Signature

Date