SATCOMRX PRIVACY POLICY & HEALTH DATA NOTICE

Website, Business Contacts, Patients and Provider Users

Effective Date: 09/01/2026 | Last Updated: 09/01/2026

This Privacy Policy describes how SatComRx LLC collects, uses, discloses, and safeguards personal information in connection with its websites and Services. It also explains the different legal posture of protected health information ("PHI") that SatComRx handles on behalf of healthcare providers.

1. Scope and HIPAA Role

SatComRx may process two broad categories of information: (a) personal information collected in SatComRx's own business capacity, such as website analytics, business-contact information, or account administration; and (b) PHI that SatComRx creates, receives, maintains, or transmits on behalf of a healthcare provider. When SatComRx acts as a Business Associate, the provider is the HIPAA Covered Entity and the provider's Notice of Privacy Practices governs the provider's uses and disclosures of PHI. The applicable Business Associate Agreement governs SatComRx's permitted PHI use. This Privacy Policy is not a HIPAA Notice of Privacy Practices.

2. Information We May Collect

Depending on the Services, SatComRx may collect identifiers and contact information; provider and practice information; patient demographic information; insurance and pharmacy-benefit information; prescription and medication information; diagnosis, treatment-history, laboratory, chart-note, and other clinical information supplied by an authorized source; prior-authorization questions and responses; payer determinations; pharmacy-selection and routing information; affordability-program information; communications; device, log, authentication, and security information; and website usage information.

3. Sources of Information

SatComRx may receive information directly from patients, prescribers, practice staff, EHRs, health plans, PBMs, ePA networks, pharmacies, manufacturers and assistance programs, authorized representatives, vendors, business partners, public provider directories, and through use of SatComRx websites and technology.

4. How SatComRx Uses Information

Subject to applicable law and contractual restrictions, SatComRx uses information to provide and support the Services; identify coverage and PA requirements; prepare and transmit authorized administrative transactions; coordinate with providers, payers, pharmacies, and programs; communicate with patients; operate accounts; secure and troubleshoot systems; prevent fraud and misuse; maintain audit trails; improve workflow and service quality; comply with law; resolve disputes; and manage corporate transactions. PHI will not be used for a purpose prohibited by the applicable BAA or HIPAA.

5. Artificial Intelligence and Automation

SatComRx may use rules engines, machine learning, natural-language processing, optical document extraction, generative AI, or similar tools to assist with administrative tasks such as classification, extraction, question matching, drafting, routing, and quality review. SatComRx will not intentionally use AI to independently diagnose a patient, select treatment, invent a clinical fact, or make a prescriber-only attestation. When third-party AI tools process PHI on SatComRx's behalf, SatComRx will require appropriate contractual and security protections, including a BAA when required. Unless expressly authorized by the provider and legally permissible, PHI will not be used to train a general-purpose model for unrelated customers.

6. Disclosure of Information

SatComRx may disclose information to the healthcare provider that engaged SatComRx; authorized practice personnel; health plans, PBMs, ePA networks, pharmacies, manufacturers, assistance programs, and other entities necessary to perform an authorized workflow; vendors and subcontractors that support SatComRx; legal and regulatory authorities when required or permitted; advisors and insurers; and parties to a corporate transaction. PHI disclosures are additionally limited by HIPAA and the applicable BAA.

7. No Sale of PHI; Advertising Restrictions

SatComRx will not sell PHI for monetary or other remuneration in violation of HIPAA. SatComRx will not use PHI received as a Business Associate to market an affiliated pharmacy or unrelated product unless the use is expressly permitted by the provider, HIPAA, and other applicable law. SatComRx will not place third-party advertising trackers on authenticated patient or provider pages in a manner that discloses PHI without a lawful basis and appropriate contractual safeguards.

8. Cookies and Website Technologies

Public, unauthenticated website pages may use cookies or similar technologies for essential functionality, security, analytics, and, if adopted, marketing. SatComRx will provide any required cookie or state-law notices and opt-out mechanisms. Authenticated, prescription-specific, or health-data pages should be configured to minimize third-party tracking and to avoid transmitting PHI to vendors that are not permitted to receive it.

9. De-Identified and Aggregated Information

Where permitted by law and contract, SatComRx may create information that has been de-identified in accordance with HIPAA or otherwise aggregated so that it does not reasonably identify an individual. SatComRx may use such data for analytics, service improvement, benchmarking, quality measurement, and business planning, subject to contractual restrictions. SatComRx will not attempt to re-identify HIPAA de-identified data except as permitted for validation of de-identification methods.

10. Security

SatComRx uses administrative, physical, and technical safeguards designed to protect personal information and ePHI, including role-based access, authentication controls, encryption where appropriate, logging, endpoint protections, workforce training, incident response, vendor oversight, and risk management. No system can be guaranteed completely secure.

11. Retention

SatComRx retains information for the period reasonably necessary to provide the Services, comply with contracts and legal obligations, maintain required audit and security records, resolve disputes, and enforce agreements. PHI retention and return/destruction are additionally governed by the applicable BAA, provider instructions, record-retention requirements, backup limitations, and legal holds.

12. Patient Rights and Requests

When SatComRx maintains PHI for a provider, patients should generally direct HIPAA access, amendment, restriction, confidential-communication, and accounting requests to the provider identified in that provider's Notice of Privacy Practices. SatComRx will support the provider's response as required by the BAA and applicable law. SatComRx may establish a process for receiving and routing such requests.

13. State Consumer Privacy Rights

Residents of certain states may have rights concerning personal information that is not exempt as PHI or otherwise exempt under applicable law, which may include rights to access, correct, delete, obtain a copy, or opt out of certain processing. SatComRx will honor applicable rights after verification and subject to statutory exceptions. A state-specific supplement should be added before SatComRx serves consumers in jurisdictions requiring additional notices, including consumer-health-data notices where applicable.

14. Children and Minors

The public website is not directed to children under 13. SatComRx may process information concerning minors when authorized by a healthcare provider, parent, guardian, personal representative, or applicable law. Rights regarding minor-consented services may differ by state and service type.

15. Communications and Call Recording

SatComRx may retain communications necessary to document and support the Services. If SatComRx records telephone calls, it will provide disclosures and obtain consent as required by applicable state law. Text-message practices are described in the Patient Communications & SMS Terms.

16. Security Incidents and Breach Notification

SatComRx maintains procedures for responding to suspected security incidents. Where SatComRx is a Business Associate, it will notify the applicable Covered Entity as required by the BAA and HIPAA. If SatComRx operates any direct-to-consumer health-data product outside HIPAA that is subject to another breach-notification regime, SatComRx will follow that regime as applicable.

17. Business Transfers

Subject to HIPAA, the BAA, and applicable law, information may be transferred as part of a merger, acquisition, financing, reorganization, bankruptcy, sale of assets, or similar transaction. Successors remain subject to applicable legal and contractual restrictions.

18. Changes to this Policy

SatComRx may update this Policy and will provide notice of material changes as required by law. The effective date at the top will identify the current version.

19. Contact

Privacy questions and requests may be directed to: Privacy Officer, SatComRx LLC, info@satcomrx.com, (844) 602-1702. Security reports may be directed to info@satcomrx.com.

20. SMS Policy

By using SatComRx SMS services, you agree to opt into SMS/ text messages from us regarding the status update of your prescription processing. Opt-in data is for direct brand use and is NOT shared with third parties or affiliates for marketing or promotional purposes.