

HIPAA Information

Trillium's Notice of Privacy Practices

This Notice Describes How Medical Information About Patients May Be Used and Disclosed And How Patients Can Get Access To This Information. This Notice of Privacy Practices applies to TrilliumBiO, LLC ("Trillium") except to the extent that Trillium performs clinical trials tests or other services that do not involve standard electronic transactions for which the Department of Health and Human Services ("HHS") has adopted standards.

Trillium's Protection of Protected Health Information (PHI)

Under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") Trillium is required by law to maintain the privacy of health information that identifies Patients, called protected health information ("PHI"), and to provide Patients with notice of our legal duties and privacy practices regarding PHI.

Trillium is committed to the protection of Patient PHI and will make reasonable efforts to ensure the confidentiality of Patient PHI as required by statute and regulation. Trillium takes this commitment seriously and will work with Patients to comply with their right to receive certain information under HIPAA.

Trillium's Use and Disclosure of PHI

As permitted under HIPAA, the following categories explain the types of uses and disclosures of PHI that Trillium may make:

For treatment

Trillium may use or disclose PHI for treatment purposes, including disclosure to physicians, nurses, medical students, pharmacies, and other health care professionals who provide Patients with health care services or are involved in the coordination of Patient care such as providing your physician with your laboratory test results.

For payment

Trillium may use or disclose PHI to bill and collect payment for laboratory or genetic counseling services we provide.

For health care operations

Trillium may disclose PHI to other health care providers or health plans that are involved in Patient care for their health care operations.

Appointment reminders and health-related benefits and services

Trillium may use and disclose PHI to contact Patients as a reminder that they have an appointment with us and may use and disclose PHI to tell Patients about health-related benefits and services that may be of interest.

Disclosure of PHI to you

Trillium may disclose PHI to Patients or as directed by Patients to a third party.

Emergency circumstances and notifications

Trillium will attempt to obtain Patient agreement to use or disclose PHI during an emergency event to notify, or assist in the notification of a family member, Patient personal representative, or another person responsible for Patient care regarding Patient location, general condition, or death. Trillium will exercise its professional judgement based on the circumstances and use and disclose PHI for Patient safety.

Individuals involved in Patient care or payment for your care

Trillium may disclose PHI to a person who is involved in Patient care or helps pay for Patient care, such as a family member or friend. We also may notify a Patient's family about Patient location or general condition or disclose such information to an entity assisting in a disaster relief effort. As allowed by federal and state law, we may disclose the PHI of minors to their parents or legal guardians.

Business associates

Trillium may disclose PHI to its business associates to perform certain business functions or provide certain business services to Trillium. For example, we may use another company to perform billing services on our behalf. All of our business associates are required to maintain the privacy and confidentiality of Patient PHI. In addition, at the request of your health care providers or health plan, Trillium may disclose PHI to their business associates for purposes of performing certain business functions or health care services on their behalf.

Disclosure for judicial and administrative proceedings

Under certain circumstances, Trillium may disclose Patient PHI in the course of a judicial or administrative proceeding, including in response to a court or administrative order, subpoena, discovery request, or other lawful process.

Law enforcement

Trillium may disclose PHI for law enforcement purposes, including reporting of certain types of wounds or physical injuries or in response to a court order, warrant, subpoena or summons, or similar process authorized by law. We may also disclose PHI when the information is needed for identification or location of a suspect, fugitive, material witness or missing person, about a victim of a crime, about an individual who has died, in relation to criminal conduct on Trillium premises, or in emergency circumstances to report a crime, the location of the crime or victims, or the identity, description, or location of the person who committed the crime.

As required by law

Trillium must disclose Patient PHI if required to do so by federal, state, or local law.

Public Health

Trillium may disclose PHI for public health activities. These activities generally include:

- ❖ disclosures to a public health authority to report, prevent or control disease, injury, or disability;
- ❖ disclosures to report births and deaths, or to report child abuse or neglect;
- ❖ disclosures to a person subject to the jurisdiction of the Food and Drug Administration (FDA) for purposes related to the quality, safety or effectiveness of an FDA-regulated product or activity, including reporting reactions to medications or problems with products or notifying people of recalls of products they may be using;
- ❖ disclosures to notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition; and
- ❖ disclosures to an employer about an employee to conduct medical surveillance in certain limited circumstances concerning work-place illness or injury.

Disclosure about victims of abuse, neglect, or domestic violence

Trillium may disclose PHI about an individual to a government authority, including social services, if we reasonably believe that an individual is a victim of abuse, neglect, or domestic violence.

Health oversight activities

Trillium may disclose PHI to a health care oversight agency for activities authorized by law such as audits, civil, administrative, or criminal investigations and proceedings/actions, inspections, licensure/disciplinary actions, or other activities necessary for appropriate oversight of the health care system, government benefit programs, and compliance with regulatory requirements and civil rights laws.

Coroners, medical examiners, and funeral directors

Trillium may disclose PHI to a coroner, medical examiner, or funeral director for the purpose of identifying a deceased person, determining cause of death, or for performing some other duty authorized by law.

Organ and Tissue Donation

If requested, Trillium may disclose PHI to organizations that handle organ procurement, or eye and tissues donation banks, or other health care organization as needed to make organ and tissue donation and transplantation possible.

Personal Representative

Trillium may disclose PHI to a Patient personal representative, as established under applicable law, or to an administrator, executor, or other authorized individual associated with your estate.

Correctional institution

Trillium may disclose the PHI of an inmate or other individual when requested by a correctional institution or law enforcement official for health, safety, and security purposes.

Serious threat to health or safety

Trillium is allowed to disclose PHI when it has a good faith belief that the disclosure is necessary to prevent or lessen a serious and/or imminent threat to the health or safety of the patient or others and is to a person or persons reasonably able to prevent or lessen the threat.

Research

Trillium may use and disclose PHI for research purposes. Limited data or records may be viewed by researchers to identify patients who may qualify for their research project or for other similar purposes, so long as the researchers do not remove or copy any of the PHI. Before we use or disclose PHI for any other research activity, one of the following will happen a committee will determine that the research activity poses minimal risk to privacy and that there is an adequate plan to safeguard PHI, if the PHI relates to deceased individuals, the researchers give us assurances that the PHI is necessary for the research and will be used only as part of the research, or the researcher will be provided only with information that does not identify a Patient.

Government functions

In certain situations, Trillium may disclose the PHI of military personnel and veterans, including Armed Forces personnel, as required by military command authorities. Additionally, we may disclose PHI to authorized officials for national security purposes, such as protecting the President of the United States, conducting intelligence, counter-intelligence, other national security activities, and when requested by foreign military authorities. Disclosures will be made only in compliance with U.S. Law.

Workers' compensation

As authorized by applicable laws, Trillium may use or disclose PHI to comply with workers' compensation or other similar programs established to provide work-related injury or illness benefits.

De-identified Information and Limited Data Sets

Trillium may use and disclose health information that has been "de-identified" by removing certain identifiers making it unlikely that you could be identified. Trillium also may disclose limited health information, contained in a "limited data set". The limited data set does not contain any information that can directly identify Patient. For example, a limited data set may include your city, county and zip code, but not your name or street address.

Some of the uses and disclosures described above may be limited or restricted by state laws or other legal requirements, for example, the Clinical Laboratory Improvement Amendments of 1988 ("CLIA"). Please contact our Privacy Officer, using the contact information provided at the end of this notice, for specific information regarding your state.

Other Uses and Disclosures of PHI

For purposes not described above, including uses and disclosures of PHI for marketing purposes and disclosures that would constitute a sale of PHI, Trillium will ask for patient authorization before using or disclosing PHI. If a Patient signed an authorization form, you may revoke it, in writing, at any time, except to the extent that action has been taken in reliance on the authorization.

Additional Safeguards and Protections

Trillium employs additional safeguards for PHI that are subject to protection under other federal and state laws, for example, relating to mental health, HIV/AIDS, and genetic testing. Additionally, federally assisted alcohol and drug treatment programs are subject to restrictions on the use and disclosure of alcohol and drug abuse treatment information. As applicable, Trillium will obtain your permission before disclosing the information to other health care providers who are not involved in your treatment program or care.

Information Breach Notification

Trillium is required to provide patient notification if it discovers a breach of unsecured PHI unless there is a demonstration, based on a risk assessment, that there is a low probability that the PHI has been compromised. A Patient will be notified without unreasonable delay and no later than 60 days after discovery of the breach. Such notification will include information about what happened and what can be done to mitigate any harm.

Patient Rights Regarding PHI

Subject to certain exceptions, HIPAA establishes the following patient rights with respect to PHI:

Right to Receive a Copy of the Trillium Notice of Privacy Practices

You have a right to receive a copy of the Trillium Notice of Privacy Practices at any time by contacting us at info@TrilliumBio.com, calling us at 1-888-262-2812 or by sending a written request to: HIPAA Privacy Officer, Trillium, 9808 Medical Center Drive, Suite 330, Rockville, MD 20850. This Notice will also be posted on the Trillium Internet site at www.Trillium-Health.com.

Right to Request Limits on Uses and Disclosures of your PHI

Patients each have the right to request that Trillium limit: 1) how we use and disclose Patient PHI for treatment, payment, and health care operations activities; or 2) our disclosure of PHI to individuals involved in Patient care or payment for Patient care. Trillium will consider Patient's request but is not required to agree to it unless the requested restriction involves a disclosure that is not required by law to a health plan for payment or health care operations purposes and not for treatment, and Patient have paid for the service in full out of pocket. If we agree to a restriction on other types of disclosures, we will state the agreed restrictions in writing and will abide by them, except in emergency situations when the disclosure is for purposes of treatment.

Right to Request Confidential Communications

Each Patient has the right to request that Trillium communicate with you about your PHI at an alternative address or by an alternative means. Trillium will accommodate reasonable requests.

Right to See and Receive Copies of Patient PHI

Each Patient and their personal representative have the right to access PHI consisting of their laboratory test results or reports ordered by their physician. Within 30 days after our receipt of request from the Patient, the Patient will receive a copy of the completed laboratory report from Trillium unless an exception applies. Exceptions include a determination by a licensed health care professional that the access requested is reasonably likely to endanger the life or safety of the Patient or another person, and our inability to provide access to the PHI within 30 days, in which case we may extend the response time for an additional 30 days if we provide the Patient with a written statement of the reasons for the delay and the date by which access will be provided. The Patient has the right to access and receive Patient PHI in an electronic format if it is readily producible in such a format.

To request a copy of your PHI:

- ❖ Ask for a courtesy copy when a Patient visits a Trillium patient service center for specimen collection.
- ❖ Ask a Trillium patient service technician for information on how to open a Trillium patient portal account to receive your laboratory reports electronically.
- ❖ Complete the Trillium HIPAA Patient Request Form.
- ❖ Contact the Privacy Officer at 1-888-262-2812 or by e-mail at info@TrilliumBiO.com.

Right to Receive an Accounting of Disclosures

Each Patient shall have a right to receive a list of certain instances in which Trillium disclosed their PHI. This list will not include certain disclosures of PHI, such as (but not limited to) those made based on a Patient's written authorization or those made prior to the date on which Trillium was required to comply. If a Patient requests an accounting of disclosures of PHI that were made for purposes other than treatment, payment, or health care operations, the list will include disclosures made in the past six years, unless a Patient requests a shorter period of disclosures. If a Patient requests an accounting of disclosures of PHI that were made for purposes of treatment, payment, or health care operations, the list will include only those disclosures made in the past three years for which an accounting is required by law, unless you request a shorter period of disclosures.

Right to Correct or Update your PHI

If a Patient believes that their PHI contains a mistake, the Patient may request, in writing, that Trillium correct the information. If the Patient's request is denied, Trillium will provide an explanation of the reasoning for denial.

How the Patient Exercises their Rights

To exercise any of the Patients' rights described in this notice, Patient must send a written request to: HIPAA Privacy Officer, Trillium, 9808 Medical Center Drive, Suite 330, Rockville, MD 20850.

How to Contact Us or File a Complaint

If a Patient has questions or comments regarding the Trillium Notice of Privacy Practices, or have a complaint about our use or disclosure of your PHI or our privacy practices, please contact: info@TrilliumBiO.com, call us at 1- 888-262-2812 and ask for the Trillium HIPAA Privacy Officer, or send a written request to: HIPAA Privacy Officer, Trillium, 9808 Medical Center Drive, Suite 330, Rockville, MD 20850.

A Patient may file a complaint with the Secretary of the U.S. Department of Health and Human Services. Trillium will not take retaliatory action against a Patient for filing a complaint about our privacy practices.

Changes to the Trillium Notice of Privacy Practices

Trillium reserves the right to make changes to this notice and to our privacy policies from time to time. Changes adopted will apply to any PHI we maintain about the Patient. Trillium is required to abide by the terms of our notice currently in effect. When changes are made, we will promptly update this notice and post the information on the Trillium website at www.Trillium-Health.com. Please review this site periodically to ensure that you are aware of any such updates.

Effective Date of Notice: April 1, 2023
Revised: January 13, 2025

HIPAA Contacts

Trillium works diligently to provide exceptional, quality service to all of its clients and is committed to implementing the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The following information is provided to assist clients in contacting the appropriate Trillium office with questions regarding HIPAA.

HIPAA Inquiries

info@TrilliumBio.com or call 1-888-261-2812