



# Privacy Policy

***This Privacy Policy is applicable to H & R Accounts, Inc. DBA Avadyne Health***

**Effective Date:** March 1, 2025

**Revision Date(s):** April 11, 2025

H & R Accounts, Inc. DBA Avadyne Health believes in your right to privacy when using the Internet for your communication, and protecting your private information is our priority. As such, H & R Accounts, Inc. DBA Avadyne Health (hereafter “HRA”) have created this Privacy Policy in compliance with applicable law and to demonstrate our firm commitment to privacy. This Privacy Policy describes how HRA collects, uses, discloses, transfers, stores, retains or otherwise processes your information when you (whether in your individual or business capacity) access or use, in any manner, any content, products, services or related activities (collectively “Services”), including through the Internet domain(s) owned or operated by HRA, which include but are not limited to:

- <https://hraccounts.mypaymed.com/login>
- <https://hraccounts.com>
- <https://www.avadynehealth.com>

We refer to the above website(s) and all related websites as “sites” and to each of them as a “site.” When we refer to “we,” “us,” or “our,” we mean HRA, or the specific division, subsidiary, or affiliate that operates a site, provides its content, or processes information received through it, each as appropriate and applicable. When we refer to “you” or “your,” we mean the person accessing the site. If the person accessing the site does so on behalf of, or for the purposes of, another person, including a business or other organization, “you” or “your” also means that other person, including a business organization.

This Privacy Policy applies to your use of our Services, and covers information collected in connection with your access to and use of our Services. Please read this Privacy Policy carefully. By continuing to interact with our Services, you are consenting to the practices described in this Privacy Policy.



## GENERAL DISCLOSURES

**Each of the sites is hosted in the United States.** If you are visiting the site(s) from outside of the United States, please note that by providing your information it is being transferred to, stored or processed in the United States and other countries, where our data center and servers are located and operated. If you are outside the United States and do not wish to allow the transfer of your personal data to the United States, you should not use these sites and opt-out of the collection of cookies. View our Cookies Policy.

We take your privacy and the protection of your personal data seriously. We will only store, process and disclose your personal information in accordance with applicable law. We will make it clear when we collect personal information and will explain what we intend to do with it. We do our best to protect your privacy through the appropriate use of information security measures.

## WHAT INFORMATION WE COLLECT

### 1. Information You Provide To Us Directly

HRA may collect different information from or about you depending on the manner in which you use our site(s) or Services. The following examples are provided to help you better understand the information we may collect through your use of the site(s) or in the course of us providing our Services.

We may collect, use, store and transfer different kinds of personal information about you, which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, date of birth, last four digits of Social Security Number and answers to security questions, like your mother's maiden name.
- **Contact Data** includes personal mailing address, email address and telephone numbers.
- **Financial Data** includes bank account number and payment card details.
- **Transaction Data** includes payment history and details about payments made by you to our third-party business partners.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes username and password and preferences.
- **Usage Data** includes information about how you use our website and services.

### 2. Information Received From Creditors

HRA may receive different information about you from our clients and business partners depending on what services and/or products you received from them. The following examples are provided to help you better understand the information we may receive from our third-party business partners.



We may collect, use, store and transfer different kinds of personal information about you, which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, date of birth and Social Security Number.
- **Contact Data** includes personal mailing address, email address and telephone numbers.
- **Financial Data** includes account balance, bank account number, payment card details and dates of service.
- **Health Data** includes provider information, insurance information, treatment descriptions and treatment dates.
- **Transaction Data** includes details about payments to and from you, payment history, and other details of products and services you have purchased from our third-party business partners.

### **3. Information Received Through Third-Party Platforms**

You may access our site(s) through third-party platforms, such as Facebook. If you use our site(s) on or through a third-party platform, including via any mobile and/or other Internet connected devices (“Wireless Devices”), or click on third-party links, the collection, use, and disclosure of your information and your use of the site(s) will also be subject to the privacy policies and other terms of such third parties or third-party platforms. You should review such privacy policies, terms and other agreements.

### **4. Collection Of Technical Information And Usage Data**

When you access HRA’s site(s), we automatically collect certain information. This information may include without limitation: (a) technical information about your computer or Wireless Device, such as your IP address, geolocation information, device type, operating system type and version, unique device ID, browser, browser language, domain and other systems information or platform types (collectively “Technical Information”); and (b) usage statistics about your interaction with HRA’s site(s), including pages accessed, referring website address(es) time spent on pages, pages visited, search queries, click data, date and time and other information regarding your use of HRA’s site(s) (collectively “Usage Data”).

This Technical Information and Usage Data, which may be linked to your personal information, is collected through the use of server logs and tracking technologies, including: (i) cookies, which are small pieces of code that websites send to your computer or Wireless Device to uniquely identify your browser or mobile device or to store information in your browser setting; and (ii) web beacons, which are small objects that allow us to measure the actions of visitors using HRA’s site(s). For more detailed information regarding how we use cookies and other technology, please review the additional information in our COOKIES POLICY outlined below.



## HOW WE USE YOUR INFORMATION

We may use information about you for a number of purposes, including:

### 1. Providing Account Payment Options

Processing or recording payment transactions on outstanding accounts.

### 2. Providing, Improving and Developing Our Services

Providing, maintaining, and improving our Services; and  
Developing new products and Services.

### 3. Communicating with You Regarding Account Information

Responding to questions or concerns.  
Sending you information we think you may find useful or which you have requested from us regarding an account in our office.

### 4. Text Messaging Communication with You Regarding Account

By providing us with your mobile number and opting-in, you give H & R Accounts, Inc. DBA Avadyne Health permission to send you account-related Text Messages, including but not limited to payment reminders and notifications, in conjunction with your account. The number of messages will vary by account. Message and data rates may apply.

By providing us with your mobile number and opting-in, you agree you have ownership rights or permission to use the number given to us.

**To opt-out, text STOP to any text message we send you.**

If your handset does not support MMS, any MMS messages sent may be delivered as SMS messages.

Wireless carriers are not liable for undelivered or delayed messages.

Subscriber text messaging originator opt-in data and consent details will not be shared with any third parties not required for our everyday business purposes except when explicitly authorized by the subscriber.

**To request support, text HELP to any message you receive or email us at [info@hraccounts.com](mailto:info@hraccounts.com)**

## **5. Protecting Our Services and Maintaining A Trusted Environment**

Enforcing our Terms of Service or other applicable agreements or policies.

Verifying your identity.

Complying with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process; and

Contacting you to resolve disputes and aid with our Services.

## **6. Other Uses**

For any other purpose disclosed to you in connection with our Services from time to time.

## **WHEN AND WITH WHOM DO WE SHARE YOUR INFORMATION**

### **1. When and How We May Share/Disclose Your Information with Third-Parties**

We will share your information with third parties under the circumstances described below or as otherwise described in this Privacy Policy:

We share information about your payments through our site(s) with our third-party business partners and payment processors.

We may share your information with third-party companies that perform services on our behalf, including for hosting the website through which we offer the payment portal for making payments on outstanding accounts. These third-party service providers may access your personal information and may only use it as directed by us for the purpose of our requested service.

We require all third parties to respect the security of your personal data. We do not allow our third-party service providers to use your personal information for their own purposes and they are only permitted to process your personal data in accordance with our instructions.

### **2. Corporate Transactions**

We may share your personal information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of HRA's business or assets to such business entity (including due to a sale in connection with a bankruptcy). We will require any such purchaser, assignee or other successor business entity to honor the terms of this Privacy Policy.

### **3. Disclosure Of Information For Legal Purposes**

HRA may disclose personal information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating any agreement with HRA, or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of our site(s), or anyone else that could be harmed by such activities. We may disclose information in response to a subpoena, search warrant, in connection with judicial proceedings, or pursuant to court orders, legal process



or other law enforcement measures. HRA may disclose or access personal information when we believe in good faith that the law requires it, to establish our legal rights or to defend against legal claims, and for administrative and other purposes that we deem necessary to maintain, service and improve our Services.

#### **4. Analytics And Data Enrichment Services**

We may use third-party analytics such as Google Analytics to help understand your usage of our site(s) and to improve our Services.

#### **5. Aggregated Or De-identified Information**

We may disclose or use aggregated or de-identified information for any purpose. Aggregated Data may be derived from your personal information but does not directly or indirectly reveal your identity.

#### **6. Text Messaging Originator**

All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

### **COOKIES POLICY**

Like many online platforms, HRA and its analytics vendors use server logs and automated data collection tools, such as browser cookies, pixel tags, scripts and web beacons. These tools are used for analytics purposes to enable HRA to understand how users interact with the site(s) and Services. HRA and its analytics vendors may tie the information gathered by these means to the identity of users.

Cookies are small text files placed on a computer or device while browsing the Internet. Cookies are used to collect, store and share bits of information about user activities. HRA uses both session cookies and persistent cookies.

Session cookies are used to identify a particular visit to HRA's site(s) and collect information about your interaction with the site(s). These cookies expire after a short time or when the user closes their web browser after using the site(s). HRA uses these cookies to identify a user during a single browsing session, such as when you log into the site(s). This helps HRA improve the site(s) and Services as well as improve the users' browsing experience.

A persistent cookie will remain on a user's device for a set period of time specified in the cookie. HRA uses these cookies to identify and recognize a specific user over a longer period of time. They allow HRA to:

- analyze the usage of the site(s) (e.g. what links users click on) in order to improve our offering;
- test different versions of the site(s) to see which particular features or content users prefer to optimize the site(s);



provide a more personalized experience to users with more relevant content and course recommendations; and  
allow users to more easily log in to use the site(s) and Services.

Examples of persistent cookies include: (i) preferences cookies to remember information about a user's browser and settings preferences, such as preferred language – preference cookies make a user's experience more functional and customized, (ii) authentication and security cookies to enable a user to log in or stay logged in to access the site(s) and Services, to protect user accounts against fraudulent log-ins by others and to help detect and protect against abuse or unauthorized usage of user accounts and (iii) functional cookies to make the experience of using the site(s) and Services better, like remembering the sound volume level selected by the user.

HRA uses tracking technology to: (i) determine if a certain page was visited or whether an email sent by HRA was opened or clicked on by a user; and (ii) to customize the learning experience of individual users by recommending specific courses and other content.

We also use clear gifs in HTML-based emails sent to our users to track which emails are opened and clicked on by recipients. We may use the information we obtain from the cookie in the administration of the site(s), to improve the usability of the site(s) and for marketing purposes. We may also use that information to recognize your computer when you visit our site(s), and to personalize our site(s) for you.

Cookies and information captured through our site(s) are stored for a certain retention period, however you can eliminate these cookies any time before the expiration date.

## HOW TO RESTRICT COOKIES

You can adjust the settings in your browser in order to restrict or block cookies that are set by the site(s) (or any other website on the Internet). Your browser may include information on how to adjust your settings. Alternatively, you may visit [www.allaboutcookies.org](http://www.allaboutcookies.org) to obtain comprehensive general information about cookies and how to adjust the cookie settings on various browsers. This site also explains how to delete cookies from your computer.

You can control and delete these cookies through your browser settings through the following:

[Google Chrome](#)

[Mozilla Firefox](#)

[Safari](#)

[Opera](#)

[Microsoft Internet Explorer](#)

[Microsoft Edge](#)

[Safari for iOS \(iPhone and iPad\)](#)

[Chrome for Android](#)

Or you can also use the following cookie management and disposal tool from Google Analytics by downloading and installing the browser plug-in from the following link:  
<http://tools.google.com/dlpage/gaoptout>.



Please be aware that restricting cookies may impact the functionality of the Services. Most browsers allow you to refuse to accept cookies. Additional general information about cookies, including how to be notified about the placement of new cookies and how to disable cookies, can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **LINKING SITES**

The site(s) contain(s) links to other websites. HRA is not responsible for the privacy practices or the content of such websites, including any websites that may indicate a special relationship or partnership with us (such as co-branded pages or "powered by" or "in cooperation with" relationships). We do not share information we gather with other websites or any other entities or individuals unless such sharing is disclosed to you in advance through this Privacy Policy. Other linked websites, however, may collect personal information from you that is not subject to our control. To ensure protection of your privacy, always review the privacy policy of the websites you may visit by linking from the site(s). Please note that this Privacy Policy applies only to our site(s), and not to other companies' or organizations' websites to which we link.

For instance, information collected through Google Analytics is shared with Google and its partners who may combine it with other information you provided to them or they collected from your use of their services. This information is stored in Google's servers according to their privacy practices.

## **SOCIAL MEDIA**

We may collect information from other sources, such as social media platforms that may share information about how you interact with our social media content. We do not control how your personal information is collected, stored or used by such third-party websites or to whom it is disclosed. You should review the privacy policies and settings on any social media website that you subscribe to so that you understand the information they collect and may be sharing. If you do not want your social media websites to share information about you, you must contact that website and determine whether it gives you the opportunity to opt-out of sharing such information. HRA is not responsible for how these third-party websites may use information collected from or about you.

Further, our site(s) may include social media features, such as the Facebook Like button. Our integration of these features may allow third-party social media to collect certain information, such as your IP address and which page(s) you are visiting when using our site(s) and Services, and to set a cookie to enable that feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing it.

## **HOW LONG WE RETAIN YOUR INFORMATION**





We generally retain your information as long as reasonably necessary to provide you the Services or to comply with applicable law and in accordance with our document retention policy. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes through other means and the applicable legal requirements. We may retain copies of information about you and any transactions or Services you have used for a period of time that is consistent with applicable law, applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulation, legal process or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce other applicable agreements or policies or to take any other actions consistent with applicable law.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you. This allows the specific information collected (name, email, address, phone number, etc.) to become anonymous, but allows HRA to keep the transaction or engagement data. For example, HRA will not be able to tell if John Smith registered for an event, but we will be able to tell that a person registered for an event and maintain headcount and transactional history. This will allow HRA to maintain a level of information that helps us develop and improve our site(s) and Services.

## **DO NOT TRACK**

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites. Most modern web browsers give you the option to send a Do Not Track signal to the websites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a website should respond to this signal, so we do not take any action in response to this signal. HRA does not have a mechanism in place to respond to DNT signals. Instead, in addition to publicly available third-party tools, we offer you the choices described in this Privacy Policy to manage the collection and use of information about you.

HRA does track some activity across websites (including your search terms, the website you visited before you visited or used the Services and other clickstream data) and we may continue to collect information in the manner described in this Privacy Policy from web browsers that have enabled DNT signals or similar mechanisms.

## **MARKETING AND PROMOTIONAL COMMUNICATIONS**

You may opt-out of receiving marketing and promotional messages from HRA, if those messages are powered by HRA, by following the instructions in those messages. If you decide to opt-out, you will still receive non-promotional communications relevant to your use of our Services.

## **CHILDREN’S ONLINE PRIVACY PROTECTION ACT (COPPA) COMPLIANCE AND RELATED INFORMATION**



The Children's Online Privacy and Protection Act (COPPA) regulates online collection of information from persons under the age of 13. It is our policy to refrain from knowingly collecting or maintaining personal information relating to any person under the age of 18. If you are under the age of 18, please do not supply any personal information through the site(s). If you are under the age of 18 and have already provided personal information through the site(s), please have your parent or guardian contact us immediately using the information provided under CONTACT US so that we can remove such information from our files.

## **SECURITY**

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, no online or computer environment is 100% secure, and we cannot guarantee absolute security of the transmission or storage of your information. We hold information about you both at our own premises and with the assistance of third-party service providers. Further public disclosure here of our security measures could aid those who might attempt to circumvent those security measures. If you have additional questions regarding security, please feel free to contact us directly using the information provided on the website under CONTACT US. To ensure that our employees comply with our privacy policies, we have developed a training program that provides all employees with the tools and knowledge to protect your personal information in all aspects of their work. Any employee who violates our privacy policies is subject to disciplinary action, including possible termination and civil and/or criminal prosecution.

## **CCPA - California Consumer Privacy Act of 2018 (CCPA).**

California residents are entitled to certain notices and disclosures regarding the collection and use of their personal information. For California consumers, H & R Accounts, Inc. follows the requirements of the California Consumer Privacy Act (CCPA) of 2018 and places a premium on consumer data security and privacy. Consumers may contact us toll-free at 866-276-0922 or by email at [info@hraccounts.com](mailto:info@hraccounts.com) with requests related to this law.

Please be aware that H & R Accounts, Inc. does not sell any data to third parties.

Please be aware that H & R Accounts, Inc. may collect information as part of servicing medical debt collections which falls under one or more of the following categories of personal information as defined by the law:

- Account name
- Address
- Age
- Alias
- Any other financial information



- Audio, electronic, visual or similar information
- Bank account number
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing tendencies
- Cookies/beacons/pixel tags, etc.
- Credit card/debit card number
- Device ID
- Disability
- Driver's license or government ID #
- Driver's license or state ID #
- Educational information, defined as information not publicly available PII as defined in FERPA
- Email address
- Employment/professional-related information (including employment history)
- Gender identity
- Geolocation data
- Inferences drawn from any of the categories to create a profile about a consumer reflecting the consumer's preferences, characteristics, aptitudes, behavior, etc.
- Insurance policy information
- Internet activity (e.g. browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)
- IP address
- Marital status
- Medical or health identifying information (including health insurance/claims info, disability info, etc.)
- Military status
- Name
- Nationality
- Online identifier
- Physiological, biological, or behavior characteristics or DNA that can be used (either by itself or with other identifying data) to establish identity
- Race
- Signature
- Social security number
- Telephone number
- Unique identifier

Our primary source of information is typically from our clients which we serve. Any information received from our clients or other sources which fall under Health Insurance Portability and Accountability Act (HIPAA) is excluded by this law. HIPAA has designated certain Protected Health Information (PHI) which may overlap with the earlier identified categories of information which H & R Accounts, Inc. may collect. Examples of PHI are:

- Names
- Dates, except year



- Telephone numbers
- Geographic data
- FAX numbers
- Social Security numbers
- Email addresses
- Medical record numbers
- Account numbers
- Health plan beneficiary numbers
- Certificate/license numbers
- Vehicle identifiers and serial numbers including license plates
- Web URLs
- Device identifiers and serial numbers
- Internet protocol addresses
- Full face photos and comparable images
- Biometric identifiers (i.e. retinal scan, fingerprints)
- Any unique identifying number or code

Please be aware that sale of personal information to or from a consumer reporting agency is excluded from CCPA if that information is to be reported in, or used to generate, a consumer report and use of that information is limited by the Fair Credit Report Act (FCRA). Information applicable to FCRA may overlap with the earlier identified categories of information which H & R Accounts, Inc. may collect.

Another exclusion under CCPA is personal information collected, processed, sold or disclosed pursuant to the federal Gramm-Leach-Bliley Act (GLBA) or the California Financial Information Privacy Act (CFIPA). Information applicable to GLBA or CFIPA may overlap with the earlier identified categories of information which H & R Accounts, Inc. may collect.

H & R Accounts, Inc. cannot provide you with legal guidance. Please contact your legal counsel for any specific questions about CCPA and your rights as well as any of the laws mentioned above.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be revised from time to time as we add new features and Services, as laws change and as industry privacy and security best practices evolve. We display an effective date on this Privacy Policy at the top of this Privacy Policy so that it will be easier for you to know when there has been a change. Changes will apply to information collected after the change is effective. Please check this Privacy Policy periodically for changes. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice. Your use of the site(s) constitutes acceptance of the provisions of this Privacy Policy and your continued usage after such changes are posted constitutes acceptance of each revised Privacy



Policy. If you do not agree to the terms of this Privacy Policy or any revised Privacy Policy, please exit the site(s) immediately. If you have any questions about this Privacy Policy, the practices of the site(s) or your dealings with the site(s), you can contact us by using the information provided under CONTACT US on our website.

## CONTACT US

If you have questions or concerns regarding the website and/or this Privacy Policy contact our Privacy Team

**By mail: H & R Accounts, Inc. C/O Privacy Team,  
5320 22<sup>nd</sup> Avenue, Moline, IL 61265**

**By email: [privacy@meduitrcm.com](mailto:privacy@meduitrcm.com)**

If you have any questions or concerns regarding our Privacy Policy, or if you believe our Privacy Policy or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with HRA using the contact information listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.

If you have questions or concerns regarding a specific account that you would like assistance on from HRA, please contact:

**By mail: H & R Accounts, Inc. C/O Operations  
5320 22<sup>nd</sup> Avenue, Moline, IL 61265**

**By email: [info@hraccounts.com](mailto:info@hraccounts.com)**