

NOTICE OF PRIVACY PRACTICES FOR MEDICAL INFORMATION

THIS NOTICE SUPPLEMENTS OUR OTHER APPLICABLE PRIVACY NOTICES AND SPECIFICALLY DESCRIBES HOW YOUR MEDICAL INFORMATION MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

A. Overview

Everbridge, Inc. (referred to herein collectively with all subsidiaries and affiliates as “Everbridge,” “we,” “us” and “our”) is committed to respecting your privacy. This Notice of Privacy Practices for Medical Information (“Notice”) is part of our commitment and our compliance with applicable data protection laws, including:

- for certain of our U.S. services and service recipients, the Health Insurance Portability and Accountability Act (“HIPAA”), and
- the General Data Protection Regulation, including the UK’s General Data Protection Regulation to the extent protected medical information contains personal data,

which generally require us to maintain the privacy of protected medical information, provide individuals with notice of our legal duties and privacy practices with respect to protected medical information, notify individuals following a breach of unsecured protected medical information, and abide by the terms of our Notice currently in effect. Our Notice describes how we collect, process, and share your medical information when we provide you with health care services, and the choices that are available to you with respect to such medical information. As used in this Notice, the terms “medical information” and “protected medical information” are intended to be synonymous with the term “Protected Health Information” as defined under HIPAA.

B. Applicability of This Notice

This Notice applies when we provide you with health care services and you are provided with a copy of this notice in connection with those services. In some cases, we will ask you to sign an acknowledgment that you have received a copy of this Notice, but whether or not you sign such acknowledgment, this Notice will apply.

This Notice does not apply when our activities are in the context of our providing services to our business clients for whom we act as a service provider (also known as a “data processor” or “business associate” under certain data protection laws), in which cases those businesses will provide you with the applicable privacy notice. This Notice also does not apply to any third-party products or services to which you may be introduced in connection with your receipt of Everbridge services.

Where we make reference to the concept of “lawful basis” for processing your personal data, such references apply only to the extent applicable data protection law (e.g., GDPR but not HIPAA) requires us to have a lawful basis for such processing.

C. Where We Rely on Consent to Process Your Medical Information

We will ask you for your consent before processing your medical information (to the extent such medical information includes your special category health data) for the following purposes:

- **Sharing with third parties.** Such as to facilitate non-emergency treatment or insurance claims.
- **Carrying out analytics.** Such as to evaluate how we can improve our services. Note that we may remove or combine individual identifiers so the information can no longer be used to identify you – it becomes anonymous; once it is anonymous, the medical information is no longer personal data and we can use or share it without consent.
- **Sending marketing tailored to you based on your medical information.**

- **Where we seek to use or share your medical information for a purpose that is not covered elsewhere in Notice or required or permitted by law.** For example, we will ask for your consent to use or share psychotherapy notes as defined by HIPAA, to share your medical information with your employer, or to share your information in a way that would be considered the sale of medical information.

You may revoke your consent at any time, but it will not affect information that we already used and disclosed.

We may process your medical information for the purposes detailed above without your consent where we need to assist in an emergency and it is not possible to obtain your consent. In these circumstances we will rely on the lawful basis of vital interests.

D. Our Uses and Sharing of Your Medical Information

Everbridge limits its uses and sharing of medical information as required by those laws applicable to our use and sharing of your medical information. We have summarized our uses and sharing of your medical information below:

a. **Treatment.** We may use and share your medical information to provide, coordinate, or manage your health care and related services, both with our own providers and with others, including outside providers, involved in your care. For example, we may use your information to tell you about possible treatment options or alternatives, and we may share with a local emergency room information about your medical history if you suffer a time-sensitive medical issue requiring urgent treatment.

b. **Payment.** We may use and share your medical information with others to bill and collect payment for the services we provide to you, such as with billing vendors, collection agencies, insurance companies, health plans and their agents, and consumer reporting agencies, and any other parties who may be involved in paying for our services on your behalf, such as an employer.

c. **Health Care Operations.** We may use and share your medical information to carry out business activities that help us conduct health care operations and improve the quality and cost of patient care. For example: we may look at patient information to evaluate the performance of our staff, plan new services, identify new locations for services, or to send you a survey; we may use and disclose your medical information to comply with this Notice and with applicable laws, or in connection with a transaction or sale affecting all or part of our business; and we may also share your information with other providers who have a relationship with you for their own health care operations, even if they are not affiliated with us.

d. **Communicating with You.** We may use and share medical information to contact you about treatment, care, or payment. For example, we may use the phone numbers (including mobile) and email addresses we have on file to send you phone calls, emails, text messages, or other communications related to your care.

e. **Business Associates / Service Providers.** Where we hire service providers, sometimes known as business associates, to help us perform services and manage our operations, we may share your medical information with them so that they can perform the services we have contracted them to perform. They must sign a contract with us that requires them to protect your medical information and keep it confidential, which they are also required to do by law.

f. **Additional Uses and Sharing.** Where allowed or required by applicable laws, we may use or share your medical information in certain situations, which may include, by way of illustrative example only: (i) as required by local, state, federal or other applicable law, such as to respond to a subpoena; or (ii) to law enforcement and correctional institutions, such as in response to certain crimes or to find a missing person. In these circumstances we will rely on the lawful basis of legal obligations to process your medical information. We may also use or share your medical information to avert a serious and imminent threat to health or safety to you or to someone else. In these circumstances we will rely on the lawful basis of vital interests to process your medical information.

E. Your Rights and Requests Regarding Your Medical Information

Certain states' and countries' data protection laws provide their residents with rights regarding our use, disclosure and other processing or handling of your medical information. Regardless of your state or country of residence, you can currently contact Everbridge at any time to make any of the requests outlined below. We will consider and respond to your requests promptly, and otherwise in accordance with all applicable laws. Furthermore, if you choose to exercise your privacy rights or make the above requests, Everbridge will not treat you in a discriminatory way, nor will you receive a lesser degree of service from Everbridge.

- **Get a copy of your medical information.** You can ask to see or obtain, or have us provide to a family member or another person or a designated entity, an electronic or paper copy of the medical information that we maintain about you. We may, to the extent permitted by applicable law, charge a reasonable, cost-based fee for the costs of copying, mailing, or other supplies associated with your request.
- **Ask us to delete certain medical information.** You can ask us to delete some or all of your personal data. We may deny your request if you ask us to delete medical information that we are required to retain under a valid lawful basis or is outside of our control. If we deny your request, we will tell you why in writing.
- **Ask us to correct your medical record.** You may ask us to correct or amend medical information that we maintain about you that you think is incorrect or inaccurate. We may deny your request for an amendment if you ask us to amend medical information that is not part of our record, that we did not create, that is not part of a designated record set, or that is accurate and complete. If we deny your request, we will tell you why in writing. We will append the material created or submitted in accordance with this paragraph to your designated record.
- **Ask us to limit our use or sharing of your medical information.** You may ask us to limit how we use or share your medical information. You can contact us and request us not to use or share certain medical information for treatment, payment, or operations or with certain persons involved in your care. We may not be required to agree. Examples of situations where, depending on applicable law, you may have the right, and you may otherwise request, to limit how we use or share your medical information include: (1) our sharing of medical information with your family, friends or others involved in your care or payment for your care; (2) our use of your medical information (such as your name, room number, and general condition) in a medical facility directory; (3) our storage of your medical information in an electronic medical records system; and (4) our use of your medical information to market our services to you or to present you with information regarding a third party's products or services.
- **Get a list of those with whom we've shared your medical information.** You may ask for an accounting of certain medical information disclosures that we have made. We may, to the extent permitted by applicable law, charge a reasonable, cost-based fee for the costs of copying, mailing, or other supplies associated with your request.
- **Choose someone to act for you.** If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your medical information. We may require additional documentation in order to confirm such designation.
- **Request confidential communications.** You may request that we communicate with you about health matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or at a specific address. We will accommodate reasonable requests.
- **Request a paper copy of this Notice.** You may request that we provide you with a paper copy of this Notice.
- **Make a complaint.** See Section F below.

Instructions for submitting requests. You can make any of the above requests by either visiting our Data Subject Request Page available here <https://www.everbridge.com/about/legal/everbridge-privacy-practices-for-medical>, or by emailing us at dsar.request@everbridge.com and clearly stating the request(s) you'd like to make.

In order to help ensure that your personal data is not disclosed to any person who does not have the right to receive it, and to help ensure your personal data is not mistakenly deleted or changed, we will attempt to verify that you are the subject of the personal data you are requesting to access, delete, or correct. We may ask for your email address and about your relationship to Everbridge (e.g., Platform user, client employee, etc.). We will compare the information you provide to any information we may have in our possession in order to verify your identity. We may also contact you at the email address you've provided to request additional information in relation to your request. Everbridge will use the information collected through the request process only for verification purposes and responding to your request.

We will confirm receipt of your request within 10 business days. If you do not receive confirmation within the 10-day timeframe, please email us at dsar.request@everbridge.com.

We endeavor to substantively respond to a verifiable request within 30 days of its receipt. If we require more time (up to another 30 days), we will contact you at the email address you provide.

Authorized Agent. You may also choose to authorize an agent to make the above requests or exercise your rights. If you use an agent, we will take measures to verify your agent's authorization to act on your behalf and we may require more information to ensure proper verification of both you and your agent's identity and authorization.

Please note that Everbridge may not be able to respond to your request if we cannot verify your identity, or your agent's identity and authority to make the request, and confirm the personal data relates to you.

Appeals Procedure. You may appeal our decision to decline your request by emailing us at dsar.request@everbridge.com using subject line "DSAR Appeal" and clearly stating the decision(s) you wish to appeal. We will respond to your appeal within 45 days of our receipt of your email, which response will include an explanation of our decision.

F. Effective Date; Changes to This Notice

This version of our Notice is effective as of January 9, 2024. We can change the terms of this Notice, and, subject to any applicable law requiring us to seek your consent, the changes will apply to all information we have about you. The new notice will be available on request, in our office, and on our website.

G. Complaints

You may complain if you feel we have violated your rights. We will not retaliate against you for filing a complaint. You may either file a complaint directly by contacting us at dsar.request@everbridge.com or by contacting a relevant regulatory authority, which may include, for example: (1) the Office for Civil Rights at the US Department of Health and Human Services (for more information about how to file a complaint, you can visit the following government website – www.hhs.gov/ocr/privacy/hipaa/complaints/); (2) for UK residents, the UK's Information Commissioner's Office; for EU residents, your member state's supervisory authority, which you can find [here](#); and (3) U.S. state attorneys general (for more information about how to identify and contact your state attorney general, you can visit the following government website – <https://www.usa.gov/state-attorney-general>). If you are a resident of a country that is not listed above, you may also have the right under your country's data protection law to lodge a formal complaint with us using the contact information listed at the end of this Privacy Notice, or by contacting your country's data protection authority.

H. Contact Us

If you have any questions about this Notice, please contact us by email at privacy@everbridge.com, by phone at +1-781-373-9800, or by mail at the following address:

Everbridge, Inc.



[everbridge.com](https://www.everbridge.com)

Attn: Privacy Officer
25 Corporate Drive, Suite 400
Burlington, MA 01803