



**NOTICE OF PRIVACY PRACTICES**  
**SETON PHARMACY, INC**  
*Effective Date: January 8, 2010*

**THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

*If you have any questions about this Notice, please contact:*

St. Vincent's HealthCare Privacy Office  
P.O. Box 2982  
Jacksonville, Florida 32203  
(904) 308-4477  
[www.jaxhealth.com](http://www.jaxhealth.com)

**SETON PHARMACY'S PLEDGE REGARDING HEALTH INFORMATION.**

Seton Pharmacy is committed to protecting the privacy of health information about you. "Protected health information," or "PHI" for short, includes information that Seton Pharmacy has created or received about your past, present, or future health or condition, the provision of health care to you, or payment for health care services that may be used to identify you. This Notice of Privacy Practices applies to all the records of your care generated or kept Seton Pharmacy. Seton Pharmacy is required by law to maintain that privacy and to provide you with this Notice. This Notice will tell you about: (i) the ways Seton Pharmacy may use and disclose PHI about you; (ii) your rights regarding PHI; and (iii) certain obligations Seton Pharmacy has regarding the use and disclosure of PHI. Seton Pharmacy is required to abide by the terms of the Notice currently in effect. However, Seton Pharmacy reserves the right to change the terms of this Notice and its privacy policies at any time. Any changes will apply to the PHI Seton Pharmacy already has. Seton Pharmacy will promptly post any new or amended versions of this Notice. This Notice will always contain an effective date on the top of the first page.

**HOW SETON PHARMACY MAY USE AND DISCLOSE HEALTH INFORMATION ABOUT YOU.**

Following are some descriptions and examples of different ways Seton Pharmacy may use and disclose PHI. Not every use or disclosure of PHI is listed below. However, all the ways Seton Pharmacy is permitted to use and disclose information will fall within one of these categories. For purposes of this Notice, PHI includes information about mental health, sexually-transmissible diseases (including HIV and AIDS), alcohol and substance abuse, and other information that may be subject to additional confidentiality provisions of federal or state law.

- **Treatment.** Seton Pharmacy may obtain information to dispense prescriptions and for the documentation of pertinent information in your records that may assist in managing your medication therapy or your overall health. Such use and disclosure will take place in providing, coordinating or managing healthcare and its related services by one or more of your providers, such as when your pharmacist consults with your physician or specialist regarding your medications, treatment or condition.

- **Payment.** Seton Pharmacy may use and disclose PHI so the treatment and services you receive at Seton Pharmacy may be billed to and payment may be collected from you, an insurance company, or a third party. For example, Seton Pharmacy may need to give your health plan information about medications ordered by your provider so your health plan will pay Seton Pharmacy or reimburse you for the pharmaceuticals.
- **Health Care Operations.** Seton Pharmacy may use and disclose PHI for Seton Pharmacy's operations. These uses and disclosures are necessary to run Seton Pharmacy and make sure patients receive quality care. For example, Seton Pharmacy may use and disclose PHI for quality assessment and improvement, planning, development, management and administration.
- **Reminders, Treatment Alternatives, and Services.** Seton Pharmacy may use and disclose PHI to contact you as a reminder to refill your prescriptions or to tell you about possible treatment options, treatment alternatives, or health-related benefits or services that may be of interest to you. If you do not want Seton Pharmacy to contact you for these purposes, you must notify the Privacy Office in writing.
- **Family and Friends.** Seton Pharmacy may release PHI to a friend or family member who is involved in your medical care. Seton Pharmacy may also give PHI to someone who helps pay for your care.
- **Research.** Under certain circumstances, Seton Pharmacy may use and disclose PHI for research purposes, if the purpose is to study morbidity and mortality of patients. Before Seton Pharmacy uses or discloses PHI for research, the project must be approved through a special process that evaluates the project, its use of PHI, and its balance of research needs with patient needs for PHI privacy. Seton Pharmacy may disclose PHI to people preparing to conduct a research project to help them look for patients with specific medical needs that are the subject of their research, so long as the PHI they review does not leave Seton Pharmacy. Lastly, if certain criteria are met Seton Pharmacy may disclose PHI to researchers after your death when it is necessary for research purposes.
- **As Required By Law.** Seton Pharmacy will disclose PHI when required to do so by federal, state, or local law.
- **To Avert a Serious Threat to Health or Safety.** Seton Pharmacy may use and disclose PHI when necessary to prevent or lessen a serious threat to your health or safety or the health or safety of the public or another person.
- **Military and Veterans.** If you are a member of the armed forces, Seton Pharmacy may release PHI as required by military command authorities based upon a subpoena or court order. Seton Pharmacy may also release PHI about foreign military personnel to the appropriate foreign military authority based upon a subpoena or court order.
- **Workers' Compensation.** Seton Pharmacy may release PHI for workers' compensation or similar programs upon your consent or as authorized by applicable law.
- **Public Health Purposes.** Seton Pharmacy may disclose PHI for public health activities, including: (i) preventing or controlling disease, injury, or disability; (ii) reporting reactions to medications or problems with products; (iii) notifying people of recalls of products they may be using; or (iv) notifying a person who may have been exposed to a disease or may be at risk for contracting or spreading an infectious disease or condition of public health significance, subject to applicable law.
- **Health Oversight Activities.** Seton Pharmacy may disclose PHI to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections, and licensure. Seton Pharmacy may also disclose PHI to federal and state agencies that regulate licenses of nurses and other health care professionals.

- **Lawsuits and Disputes.** If you are involved in a lawsuit or a dispute, Seton Pharmacy may disclose PHI in response to a court or administrative order, subpoena, discovery request, or other lawful process by someone else involved in the dispute. The disclosure will be made after Seton Pharmacy receives satisfactory assurance that a reasonable effort has been made either to give you notice of the request or to secure a qualified protective order.
- **Law Enforcement.** Seton Pharmacy may release PHI if asked to do so by a law enforcement official: (i) in response to a court or administrative order, subpoena, warrant, summons, or similar process; (ii) to identify or locate a suspect, fugitive, material witness, or missing person; (iii) about the victim of a crime if, under certain limited circumstances, Seton Pharmacy is unable to obtain the person's agreement; (iv) about a death Seton Pharmacy believes may be the result of criminal conduct; (v) about criminal conduct at Seton Pharmacy; or (vi) 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.
- **National Security and Intelligence Activities.** Seton Pharmacy may release PHI to authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.
- **Inmates.** If you are an inmate of a correctional institution or under the custody of a law enforcement official, Seton Pharmacy may release certain PHI to the correctional institution or law enforcement official in accordance with law. This release would be necessary: (i) for the institution to provide you with health care; (ii) to protect your health and safety or the health and safety of others; or (iii) for the safety and security of the correctional institution.

#### **OTHER USES OF HEALTH INFORMATION.**

Other uses and disclosures of PHI not covered by this Notice or the laws that apply to Seton Pharmacy will be made only with your written authorization. You may revoke your written authorization at any time by delivering a written revocation to the Privacy Office. If you revoke your authorization, Seton Pharmacy will no longer use or disclose PHI about you for the reasons covered by your written authorization. You understand that Seton Pharmacy is unable to take back any disclosures Seton Pharmacy has already made and that Seton Pharmacy is required to retain records of the care provided to you.

#### **YOUR RIGHTS REGARDING HEALTH INFORMATION ABOUT YOU.**

You have the following rights regarding health information Seton Pharmacy maintains about you:

- **Right to Inspect and Copy.** In most circumstances, you have the right to inspect and copy PHI that may be used to make decisions about your care. To inspect and copy PHI, you must submit your request in writing to Consolidated Pharmacy Services, Inc., 2651 Park Street, Jacksonville, FL 32204. Charges for the costs of copying, mailing, or other supplies associated with your request may apply.

Seton Pharmacy may deny your request to inspect and copy PHI in certain circumstances. If you are denied access to PHI, you may request that the denial be reviewed. If your request is reviewed, another licensed health care professional chosen by Seton Pharmacy will review your request and the denial. The person conducting the review will not be the person who denied your request. Seton Pharmacy will comply with the outcome of the review.

In certain instances, in lieu of providing copies, Seton Pharmacy may choose to provide you with a summary or explanation of the requested records. You may be charged fees for a summary or explanation.

- **Right to Amend.** If you feel that PHI Seton Pharmacy has about you is incorrect or incomplete, you may ask Seton Pharmacy to amend the PHI. You have the right to request an amendment for as long as the PHI is kept by or for Seton Pharmacy.

To request an amendment, your request must be made in writing and submitted to the Privacy Office. In addition, you must provide a reason that supports your request.

Seton Pharmacy may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, Seton Pharmacy may deny your request if you ask Seton Pharmacy to amend information that: (i) was not created by Seton Pharmacy, unless the person or entity that created the information is no longer available to make the amendment; (ii) is not part of the PHI kept by or for Seton Pharmacy; (iii) is not part of the information which you would be permitted to inspect and copy; or (iv) is accurate and complete.

- **Right to an Accounting of Disclosures.** You have the right to request an accounting of disclosures. This is a list of the disclosures Seton Pharmacy made of PHI about you. The list will not include any of the uses and disclosures for treatment, payment, and health care operations or for certain other limited reasons.

To request an accounting of disclosures, you must submit your request in writing to the Privacy Office. Your request must state a time period that is not longer than six years prior to the date of your request and that does not include dates before April 14, 2003. Your request should indicate whether you want the list on paper or electronically. The first list you request within a 12-month period will be free. For additional lists, Seton Pharmacy may charge you for the cost of providing the list. Seton Pharmacy will notify you of the cost involved, and you may choose to withdraw or modify your request at that time before any costs are incurred.

- **Right to Request Restrictions.** You have the right to request a restriction or limitation on PHI Seton Pharmacy uses or discloses about you. You also have the right to request a limit on PHI Seton Pharmacy discloses about you to someone who is involved in your care or the payment for your care, like a family member or a friend.

*Seton Pharmacy is not required to agree to your request unless the restriction is for a disclosure to a health plan for purposes of carrying out payment or health care operations and the protected health information pertains solely to a health care item or service which has been paid out of pocket in full.* If Seton Pharmacy does agree, Seton Pharmacy will comply with your request unless the PHI is needed to provide you emergency treatment. To request restrictions, you must make your request in writing to the Privacy Office. In your request, you must tell Seton Pharmacy: (i) what information you want to limit; (ii) whether you want to limit Seton Pharmacy's use, disclosure, or both; and (iii) to whom you want the limits to apply. You may not limit the uses and disclosures that Seton Pharmacy is legally required or allowed to make.

- **Right to Request Confidential Communications.** You have the right to request that Seton Pharmacy communicate with you about medical matters in a certain way or at a certain location. For example, you can ask that Seton Pharmacy only contact you at work or by mail.

To request confidential communications, you must make your request in writing to the Privacy Office. Seton Pharmacy will not ask you the reason for your request. Seton Pharmacy will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

- **Right to a Paper Copy of This Notice.** You have the right to a paper copy of this Notice. You may ask Seton Pharmacy to give you a copy of this Notice at any time. Even if you have agreed to receive this Notice electronically, you are still entitled to a paper copy of this Notice. You may obtain a copy of this Notice at the Seton Pharmacy website, [www.jaxhealth.com](http://www.jaxhealth.com). To obtain a paper copy of this Notice, contact the Privacy Office as identified on the first page of this Notice.

## **COMPLAINTS.**

If you believe your privacy rights have been violated, you may file a complaint with Seton Pharmacy or with the Secretary of the U.S. Department of Health and Human Services. To file a complaint with Seton

Pharmacy, contact the **Privacy Office, 1800 Barrs Street, Jacksonville, FL 32204, (904) 308-4477**. All complaints must be submitted in writing. You will not be retaliated against for filing a complaint.