

EMBERS TO BLOOM LLC PRIVACY POLICY

Original Effective Date: 09/01/2025

Review Date (Today): 09/03/2026

Next Review Date: 09/03/2027

1. Our Commitment to Your Privacy

Embers to Bloom LLC ("the Agency," "we," "us," or "our") respects the privacy of our digital network users. This policy outlines how we handle data collected via www.emberstobloom.com and our secure cloud-based intake structures.

2. Multi-Channel Data Funnels

We harvest information across three distinct corporate pathways to optimize user experience and reduce friction:

- Clients & Families (Self-Reporting): Full names, contact variables, and coverage classifications (including Ohio Medicaid verification).
- Community Providers (Other Agencies): Professional titles, organizational affiliations, and diagnostic referral data.
- Agency Partnerships (B2B): Executive credentials and projected case collaboration volumes.

3. Protection of Health Information (HIPAA, Telehealth, & National Remote Infrastructure)

Any sensitive health data or Protected Health Information (PHI) submitted via our secure portal is encrypted using Transport Layer Security (TLS) and stored on AES-256 secure networks. Because our workforce operates remotely across state lines, role-based data restrictions ensure that out-of-state personnel only access records necessary to execute licensed care inside the State of Ohio.

4. Special 42 CFR Part 2 Substance Use Disorder (SUD) Confidentiality Protocol

The confidentiality of substance use disorder client records maintained by our clinical ecosystem is specifically protected by federal law under 42 CFR Part 2 and HIPAA. Generally, the Agency may not say to a person outside the program that a client attends the program, or disclose any information identifying a client as having a substance use disorder unless:

1. The client consents in writing;
2. The disclosure is allowed by a court order; or
3. The disclosure is made to medical personnel in a medical emergency or to qualified personnel for research, audit, or program evaluation.

5. Ohio Medicaid & Managed Care Information Exchange

For clients utilizing Ohio Medicaid, we share necessary demographic and clinical treatment information with Ohio's Managed Care Entities (including CareSource, Buckeye Health Plan, Molina, UnitedHealthcare Community Plan, Aetna Better Health, and Anthem Blue Cross Blue Shield) solely to facilitate coverage validation, diagnostic verification, and clean billing execution under Ohio Administrative Code frameworks.

6. Text Messaging & Communication Consent

By providing your telephone number on our intake webforms, you explicitly consent to receive transactional and scheduling text messages from Embers to Bloom LLC. Message and data rates may apply. You may opt out at any time by replying "STOP".