OUTCOME BASED TECHNOLOGIES
RECOVERY BUILT AROUND YOU

HIPAA & PROTECTED HEALTH INFORMATION (PHI) POLICY

Effective Date: October 22, 2026

This HIPAA & Protected Health Information ("PHI") Policy describes how Outcome-Based Technologies, LLC ("OBT," "we," "our," or "us") collects, receives, stores, transmits, uses, and protects Protected Health Information in connection with our products, services, website, and OBT App.

OBT is committed to maintaining the confidentiality, integrity, and availability of Protected Health Information in accordance with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), as amended, and all other applicable federal and state privacy and security laws.

---

1. Purpose

The purpose of this Policy is to describe OBT's practices regarding the protection of Protected Health Information ("PHI") and to explain the safeguards implemented to protect patient information throughout its lifecycle.

OBT does not bill health plans or conduct HIPAA standard transactions and is not a HIPAA covered entity. OBT voluntarily applies the safeguards described in this Policy to protect patient information.

---

2. Scope

This Policy applies to all PHI received, created, maintained, transmitted, or otherwise processed by OBT in connection with:

- Medical device manufacturing
- Custom medical device design
- Clinical evaluations
- Product fitting
- Customer support
- The OBT App
- Our website and related services

---

3. Protected Health Information

Protected Health Information may include, but is not limited to:

- Patient name
- Contact information
- Date of birth
- Medical diagnoses
- Physician information
- Prescriptions

- Insurance information
- Anatomical measurements
- 3D scans
- Clinical photographs
- Facial features that may appear in 3D scans or photographs
- Device fitting information
- Treatment information
- Any information that identifies an individual in connection with healthcare services

OBT collects only the information reasonably necessary to provide our products and services.

---

4. Use of PHI

OBT may use Protected Health Information for purposes including:

- Designing and manufacturing custom medical devices
- Verifying physician orders and prescriptions
- Device fitting and clinical support
- Customer service
- Regulatory compliance
- Product quality improvement
- Warranty support
- Internal quality assurance
- Legal obligations permitted or required by law

OBT does not sell Protected Health Information. OBT does not use PHI, including 3D scans and photographs, for advertising or marketing, to identify or authenticate individuals by their facial features, or to develop or train machine-learning or artificial-intelligence models.

---

5. Disclosure of PHI

OBT may disclose PHI only when permitted or required by applicable law, including:

- Healthcare providers
- Authorized healthcare facilities
- Insurance companies
- Government agencies
- Regulatory authorities
- Business Associates performing services on behalf of OBT
- Other parties authorized by the patient or applicable law

Business Associate Agreements ("BAAs") are maintained when required by HIPAA.

---

6. OBT App Security

The OBT App is designed to provide healthcare providers and authorized users with a secure method of submitting Protected Health Information necessary for the design, manufacture, fitting, servicing, and support of OBT medical devices.

Protected Health Information submitted through the OBT App, including patient information, anatomical scans, photographs, measurements, prescriptions, and related documentation, is transmitted using encrypted communications and stored within secure systems designed to protect the confidentiality, integrity, and availability of PHI.

The OBT App uses the device's rear camera and, on devices that have one, the rear LiDAR sensor only to capture patient scans. It does not use Face ID, the TrueDepth camera, face tracking or facial recognition, and it does not create biometric identifiers. How scans and any facial images they contain are collected, shared, stored, retained and deleted is described in Section 8 of OBT's Privacy & Safety Policy.

OBT utilizes industry-standard encryption technologies during data transmission and implements appropriate administrative, technical, and physical safeguards to help prevent unauthorized access, disclosure, alteration, or destruction of Protected Health Information.

Access to PHI submitted through the OBT App is limited to authorized OBT personnel and approved Business Associates who require such information to perform legitimate business functions.

Although OBT employs commercially reasonable and industry-standard security measures, users remain responsible for maintaining the security of their own devices, passwords, login credentials, and internet connections when accessing the OBT App.

---

7. Administrative, Technical & Physical Safeguards

OBT maintains safeguards designed to protect PHI, including, where appropriate:

- Role-based user access controls
- Multi-factor authentication
- Encryption during electronic transmission
- Secure cloud-based infrastructure
- Firewall and endpoint protection
- Security monitoring
- Employee confidentiality agreements
- Workforce privacy training
- Secure backup systems
- Disaster recovery procedures
- Vendor security reviews
- Business Associate Agreements where required

These safeguards are periodically reviewed and updated to address evolving security risks.

---

8. Security Incidents & Breaches

If OBT becomes aware of an actual or suspected unauthorized access, disclosure, acquisition, alteration, loss, or destruction of Protected Health Information, OBT will investigate the incident promptly and take appropriate corrective action.

Where required by applicable law, OBT will provide breach notifications in accordance with HIPAA and other applicable federal or state requirements.

---

9. Patient Rights

Where applicable under HIPAA, individuals may have the right to:

- Request access to their PHI
- Request correction of inaccurate information
- Request confidential communications
- Request restrictions on certain disclosures
- Receive an accounting of certain disclosures
- File a privacy complaint

OBT will respond to applicable requests in accordance with governing law.

---

10. Data Retention

Patient scans, order records and device records are retained as part of OBT's medical device and quality records for ten (10) years from the date the device is manufactured. Other Protected Health Information is retained only as long as necessary to satisfy legal, regulatory, contractual, operational, or business requirements.

Retention by OBT's service providers that handle scans is described in Section 8 of OBT's Privacy & Safety Policy. Requests to delete PHI may be sent to cs@obtdme.com; OBT will delete PHI that it is not required to retain.

When PHI is no longer required, OBT will securely destroy or permanently de-identify the information in accordance with applicable laws and industry best practices.

---

11. Website Communications

While OBT utilizes commercially reasonable safeguards to protect information submitted through our website, users should avoid submitting unnecessary medical information through general contact forms or unsecured communication methods.

Whenever possible, Protected Health Information should be submitted using the secure OBT App or other secure communication methods authorized by OBT.

---

12. Third-Party Service Providers

OBT may utilize third-party vendors for cloud hosting, information technology services, payment processing, shipping, communications, and related business operations.

Service providers that may receive PHI submitted through the OBT App include MyFit Solutions (scanning and 3D reconstruction), Google Cloud/Firebase (app backend), Resend (order email delivery), Make.com (order automation), Microsoft 365 (record storage) and HP Inc. (troubleshooting of OBT's collar design software). Each may use PHI only to provide its services to OBT.

Where required, OBT enters into Business Associate Agreements or other contractual arrangements requiring such vendors to maintain appropriate safeguards for Protected Health Information.

---

13. Changes to this Policy

OBT reserves the right to modify this Policy at any time to reflect changes in applicable laws, regulations, technology, or business practices.

Updated versions will become effective upon posting to our website.

---

14. Contact Information

Outcome-Based Technologies, LLC
7830 E. Gelding Drive, Suite 300
Scottsdale, Arizona 85260

Telephone: (888) 609-2563
Fax: (888) 619-5948
Email: info@obtdme.com
Website: www.obtdme.com

Questions regarding this HIPAA & PHI Policy or requests concerning Protected Health Information may be directed to OBT using the contact information above.