

CuraWell LLC

Website Privacy Policy + HIPAA Notice of Privacy Practices

Last Updated: December 19, 2025

Jurisdiction: Texas with federal overlays (HIPAA, HITECH and related regulations).

Website: www.curawellwoundcare.com

Privacy Officer: Grace Onyango, CuraWell LLC

This document is written in a formal legal/compliance style to support Website publication, referral packets, credentialing, and audit readiness. Part I (Website Privacy Policy) applies to personal information collected through the Website and related online interactions. Part II (HIPAA Notice of Privacy Practices) applies to Protected Health Information (“PHI”) created or received by CuraWell in connection with clinical services. If a term in this document conflicts with CuraWell’s Terms and Conditions of Use, the Terms govern Website use; if a term in this document conflicts with a signed patient agreement, the signed agreement governs to the extent permitted by law.

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Part I — Website Privacy Policy

1. Scope and Relationship to Clinical Services

This Website Privacy Policy applies to personal information collected through www.curawellwoundcare.com (the “Website”) and related online interactions. It does not govern PHI collected as part of clinical services; PHI is governed by Part II (HIPAA Notice). Using the Website does not create a provider–patient relationship. The Website is informational and is not intended to provide medical advice.

2. Definitions (Website Context)

“**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual. “**Sensitive Data**” includes categories recognized by applicable law (for example, precise geolocation, biometric data, and certain health-related information) when collected outside the HIPAA clinical context. “**Process**” means to collect, use, store, disclose, analyze, delete, or otherwise handle information.

3. Information We Collect

Depending on how you interact with the Website, CuraWell may collect the categories below. CuraWell requests that Website users **not** submit PHI or other sensitive medical information via Website contact forms.

Category	Examples	Source
Identifiers	Name, email address, telephone number, mailing address (if provided).	You (forms), communications
Internet/Device Data	IP address, device identifiers, browser type, OS, approximate location from IP.	Automatic (logs/cookies)
Usage/Interaction Data	Pages viewed, clicks, referring URLs, session metadata, performance logs.	Automatic (analytics)
Communications Data	General inquiry messages and attachments (if any).	You (email/forms)

4. Important Notice: Do Not Submit PHI Through the Website

Website contact forms and email links are for general inquiries only. You should not submit patient records, diagnoses, treatment plans, photographs of wounds, insurance identifiers, or other PHI through the Website. Website communications may not be encrypted end-to-end. For clinical matters, contact CuraWell by phone.

5. Purposes of Use

CuraWell uses Website personal information to: (a) respond to inquiries; (b) provide requested information; (c) operate, maintain, and improve the Website; (d) maintain security, detect fraud, and prevent misuse; (e) comply with legal obligations; and (f) maintain administrative records of communications.

6. Disclosures to Third Parties

CuraWell may disclose Website personal information to: (a) vendors that provide Website-related services (hosting, analytics, customer support tools) under contractual confidentiality and security obligations; (b) professional advisors (legal, accounting) as necessary; (c) governmental authorities when required by law; and (d) successors in interest in connection with a merger, acquisition, financing, or sale of assets, subject to appropriate safeguards.

7. Cookies, Analytics, and Similar Technologies

CuraWell may use cookies, pixels, and similar technologies to operate the Website and understand usage. You can control cookies through browser settings. Disabling cookies may limit functionality. Where required by law, CuraWell will honor opt-out mechanisms and universal opt-out signals (such as Global Privacy Control) for applicable processing activities.

8. Data Retention

CuraWell retains Website personal information for as long as reasonably necessary to fulfill the purposes described in this Policy, to maintain business records, and to comply with applicable law. Retention periods

vary based on the nature of the information and the purpose for which it is used.

9. Security

CuraWell maintains administrative, technical, and physical safeguards designed to protect Website information from unauthorized access, destruction, loss, alteration, or disclosure. No method of transmission or storage is completely secure; therefore, CuraWell cannot guarantee absolute security.

10. Texas Consumer Privacy Rights (Texas Data Privacy and Security Act)

To the extent applicable, Texas residents may have rights regarding their personal data, including the rights to: (a) confirm whether a controller processes personal data and access that data; (b) correct inaccuracies; (c) delete personal data; (d) obtain a copy of certain data in a portable format; and (e) opt out of processing for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects. CuraWell does not sell Website personal data. Where applicable, CuraWell provides an opt-out mechanism for processing activities covered by law.

10.1 Request Submission, Authentication, and Fees

Requests to exercise applicable Texas privacy rights must be submitted using the methods in Appendix C. CuraWell may require commercially reasonable authentication. CuraWell will respond without undue delay and no later than **45 days** after receipt, and may extend once by an additional **45 days** when reasonably necessary, provided CuraWell informs you of the extension and reason within the initial 45-day period. Responses are provided free of charge up to two times per year per consumer unless a request is manifestly unfounded, excessive, or repetitive.

10.2 Appeals

If CuraWell declines to take action regarding a request, CuraWell will provide a justification and instructions to appeal. CuraWell will respond to an appeal no later than **60 days** after receipt. If an appeal is denied, CuraWell will provide an online method for contacting the Texas Attorney General, as required by law.

11. Children

The Website is not directed to children under 13, and CuraWell does not knowingly collect personal information from children under 13 through the Website.

12. Changes to This Website Privacy Policy

CuraWell may update this Policy. The "Last Updated" date indicates the most recent revision. Material changes may be posted on the Website.

Part II — HIPAA Notice of Privacy Practices (NPP)

13. This Notice Applies To

This HIPAA Notice applies to CuraWell LLC, its employees, volunteers, trainees, and other workforce members, and to contractors and vendors to the extent they are acting on CuraWell's behalf and are required by contract to protect PHI. This Notice describes how CuraWell may use and disclose PHI and how you can obtain access to your PHI.

14. Key Terms

Protected Health Information (PHI) is individually identifiable health information maintained in any form or medium, including electronic PHI (ePHI).

Designated Record Set includes medical and billing records and other records used to make decisions about you.

Treatment, Payment, and Healthcare Operations are HIPAA categories authorizing many routine uses and disclosures without written authorization.

15. CuraWell's Legal Duties

CuraWell is required by law to maintain the privacy and security of PHI; provide you with this Notice; follow the terms of the Notice currently in effect; and notify affected individuals following a breach of unsecured PHI.

16. Uses and Disclosures of PHI Without Your Written Authorization

HIPAA permits or requires CuraWell to use or disclose PHI without your written authorization for the purposes described below. Some disclosures are subject to specific conditions, limitations, or legal process. See Appendix A for a detailed matrix.

16.1 Treatment

CuraWell may use PHI to provide, coordinate, or manage your wound care and related services and may disclose PHI to other healthcare providers involved in your care. Examples include consultations, referrals, coordinating home health or specialist services, and communicating relevant clinical information to support continuity of care.

16.2 Payment

CuraWell may use and disclose PHI to obtain payment for services. Examples include billing, claims submission, eligibility and coverage verification, prior authorization (when applicable), collection activities, medical necessity determinations, and utilization review.

16.3 Healthcare Operations

CuraWell may use and disclose PHI for healthcare operations. Examples include quality assessment and improvement; outcome tracking; training; accreditation; licensing; credentialing; auditing; compliance; risk management; business planning; customer service; and general administrative activities.

16.4 Individuals Involved in Your Care; Family and Friends

CuraWell may disclose PHI to a family member, personal representative, or another person involved in your care or payment for your care, to the extent relevant to that involvement, unless you object. If you are present and able to decide, CuraWell will ask your permission or provide you an opportunity to object. If you are not present or are incapacitated, CuraWell may disclose PHI if, in CuraWell's professional judgment, it is in your best interest.

16.5 Appointment Reminders and Health-Related Benefits

CuraWell may use PHI to contact you with appointment reminders, care coordination communications, and information about treatment alternatives or health-related benefits and services that may be of interest to you.

16.6 Public Health Activities (45 C.F.R. § 164.512(b))

CuraWell may disclose PHI to public health authorities for public health activities such as preventing or controlling disease, injury, or disability; reporting to the FDA regarding adverse events; and reporting exposures or conditions as required or authorized by law.

16.7 Health Oversight Activities (45 C.F.R. § 164.512(d))

CuraWell may disclose PHI to health oversight agencies for authorized activities such as audits, investigations, inspections, licensure, and compliance monitoring.

16.8 Judicial and Administrative Proceedings (45 C.F.R. § 164.512(e))

CuraWell may disclose PHI in response to a court order, subpoena, discovery request, or other lawful process, subject to HIPAA's procedural requirements and any applicable Texas law protections.

16.9 Law Enforcement Purposes (45 C.F.R. § 164.512(f))

CuraWell may disclose PHI for certain law enforcement purposes, including in response to a court order or subpoena; to identify or locate a suspect, fugitive, material witness, or missing person (limited information); and to report certain crimes under specific circumstances.

16.10 Abuse, Neglect, or Domestic Violence (45 C.F.R. § 164.512(c))

CuraWell may disclose PHI to authorized government authorities if CuraWell reasonably believes a patient is a victim of abuse, neglect, or domestic violence, as required or authorized by law and subject to applicable conditions.

16.11 Coroners, Medical Examiners, and Funeral Directors (45 C.F.R. § 164.512(g))

CuraWell may disclose PHI to coroners or medical examiners for identification and cause of death determinations and to funeral directors as necessary to carry out their duties.

16.12 Organ and Tissue Donation (45 C.F.R. § 164.512(h))

CuraWell may disclose PHI to organizations involved in organ procurement, donation, and transplantation.

16.13 Research (45 C.F.R. § 164.512(i))

CuraWell may use or disclose PHI for research purposes under HIPAA-approved conditions, such as pursuant to a waiver by an Institutional Review Board or Privacy Board, as part of a limited data set under a data use agreement, or with your authorization where required.

16.14 Serious Threat to Health or Safety (45 C.F.R. § 164.512(j))

CuraWell may disclose PHI if CuraWell believes it is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public, to someone able to help prevent or lessen the threat.

16.15 Specialized Government Functions (45 C.F.R. § 164.512(k))

CuraWell may disclose PHI for specialized government functions such as military and veterans activities, national security and intelligence, protective services for the President, and certain correctional institution or law enforcement custodial situations, as permitted by law.

16.16 Workers' Compensation (45 C.F.R. § 164.512(l))

CuraWell may disclose PHI as authorized by and to the extent necessary to comply with workers' compensation laws and similar programs providing benefits for work-related injuries or illness.

16.17 Required Disclosures

CuraWell is required to disclose PHI in certain circumstances, including: (a) to you (or your personal representative) when you exercise your right of access under HIPAA; and (b) to the U.S. Department of Health and Human Services when required for compliance investigations or enforcement actions.

17. Uses and Disclosures Requiring Your Written Authorization

CuraWell will obtain your written authorization before using or disclosing PHI in situations that require authorization under HIPAA. Except as otherwise permitted by law, CuraWell will not use or disclose psychotherapy notes without authorization; will not disclose PHI for most marketing purposes without authorization; and will not sell PHI. You may revoke an authorization in writing at any time, except to the extent CuraWell has relied on it.

18. Minimum Necessary Standard

For uses and disclosures other than treatment, CuraWell applies the "minimum necessary" standard and limits PHI to the minimum necessary to accomplish the intended purpose. CuraWell uses role-based access, workforce training, and administrative review for non-routine requests and disclosures.

19. Business Associates

CuraWell may disclose PHI to vendors who perform services on CuraWell's behalf involving PHI (e.g., billing, IT support). CuraWell maintains Business Associate Agreements requiring such vendors to safeguard PHI and limit use and disclosure consistent with HIPAA.

20. Safeguards and Security

CuraWell maintains administrative, physical, and technical safeguards designed to protect PHI and ePHI, including access controls, workforce training, risk management practices, and incident response procedures. CuraWell's safeguards are designed to support compliance with HIPAA's Privacy and Security Rules.

21. Your Rights Regarding PHI

You have rights regarding your PHI. CuraWell may require requests to be submitted in writing and may require verification of identity. Procedural details, timelines, fees, and denial/review rules are set out in Appendix B.

21.1 Right of Access (45 C.F.R. § 164.524)

You may request to inspect or obtain a copy of PHI about you in a Designated Record Set. CuraWell will respond no later than 30 calendar days after receiving your request. CuraWell may extend once by 30 days if it provides you a written statement of the reasons for the delay and the date by which CuraWell will complete the action. CuraWell will provide the requested PHI in the form and format requested if it is readily producible, including electronic formats when applicable.

21.2 Denials of Access

In limited circumstances, CuraWell may deny access as permitted by HIPAA (for example, certain psychotherapy notes, information compiled for legal proceedings, or other grounds recognized by law). If access is denied, CuraWell will provide a written denial describing the basis for denial and any right to have the denial reviewed, as applicable.

21.3 Right to Request Amendment (45 C.F.R. § 164.526)

You may request that CuraWell amend PHI in your Designated Record Set. Requests must be in writing and must state the reason for the amendment. CuraWell may deny amendment requests as permitted by HIPAA (for example, if the record was not created by CuraWell or is accurate and complete).

21.4 Right to an Accounting of Disclosures (45 C.F.R. § 164.528)

You may request an accounting of certain disclosures of your PHI made by CuraWell (excluding disclosures for treatment, payment, and healthcare operations and other exclusions under HIPAA). You may request an accounting for up to six (6) years prior to the date of your request, subject to HIPAA limitations.

21.5 Right to Request Restrictions (45 C.F.R. § 164.522)

You may request restrictions on CuraWell's use or disclosure of PHI for treatment, payment, or healthcare operations, or to individuals involved in your care. CuraWell is not required to agree to most restrictions, but will comply with restrictions where required by law.

21.6 Right to Request Confidential Communications

You may request to receive communications about medical matters in a particular way or at a particular location. Reasonable requests will be accommodated.

21.7 Right to Receive a Paper Copy of This Notice

You may request a paper copy of this Notice at any time, even if you have agreed to receive it electronically.

22. Breach Notification (HIPAA + Texas Overlay)

If there is a breach of unsecured PHI, CuraWell will provide breach notification as required by HIPAA, generally without unreasonable delay and no later than 60 calendar days after discovery. In addition, Texas law may impose additional notification requirements for certain types of sensitive personal information. Where applicable, CuraWell will also comply with Texas breach reporting obligations, including notifying affected individuals within applicable Texas timelines and, if required, reporting to the Texas Attorney General via the state's electronic reporting mechanism.

23. Texas Medical Privacy Laws; Preemption

CuraWell complies with HIPAA and applicable Texas medical privacy laws, including Texas Health & Safety Code Chapter 181. Where Texas law provides more stringent protections or requirements than HIPAA, CuraWell will comply with the more protective standard.

24. Complaints; Non-Retaliation

If you believe your privacy rights have been violated, you may file a complaint with CuraWell's Privacy Officer (Appendix C) and/or with the U.S. Department of Health and Human Services Office for Civil Rights. CuraWell will not retaliate against you for filing a complaint.

25. Changes to This Notice

CuraWell reserves the right to change this Notice and to make the revised Notice effective for PHI CuraWell maintains. The current Notice will be available upon request and may be posted on the Website.

Appendix A — HIPAA Uses & Disclosures Matrix (Detailed)

This Appendix provides a structured, compliance-oriented reference to common HIPAA disclosure categories. Actual disclosures are performed in accordance with HIPAA, applicable Texas law, and CuraWell policies and procedures. This Appendix is not intended to list every possible permitted disclosure under federal or state law.

Category	HIPAA Basis	Conditions / Limits	Examples
Treatment	45 C.F.R. § 164.506	No authorization required.	Coordination of wound care; referrals; consultations; sharing records with providers involved in care.
Payment	45 C.F.R. § 164.506	No authorization required.	Claims, billing, eligibility checks, prior authorization, collections.
Healthcare Operations	45 C.F.R. § 164.506	No authorization required; minimum necessary applies.	Quality improvement, audits, training, compliance, business management.
Individuals Involved in Care	45 C.F.R. § 164.510(b)	Opportunity to agree/object when feasible; professional judgment if incapacitated.	Discussing care with family caregiver; care coordination calls.
Required by Law	45 C.F.R. § 164.512(a)	Only as required by law; limited to legal requirement.	Mandatory reporting obligations.
Public Health	45 C.F.R. § 164.512(b)	To public health authorities; as authorized by law.	Reporting certain conditions; FDA reporting; public health investigations.
Health Oversight	45 C.F.R. § 164.512(d)	To oversight agencies for authorized activities.	Licensing, compliance inspections, audits, investigations.
Judicial/Administrative	45 C.F.R. § 164.512(e)	Court orders or lawful process; may require assurances.	Court order; subpoena with required notices/qualified protective order.
Law Enforcement	45 C.F.R. § 164.512(f)	Limited; specific conditions apply.	Reporting crimes on premises; locating missing person (limited info).
Abuse/Neglect/DV	45 C.F.R. § 164.512(c)	To authorized authorities; conditions apply.	Reporting suspected abuse where permitted/required.
Coroners/Medical Examiners	45 C.F.R. § 164.512(g)	As necessary for duties.	Cause of death determination.
Organ Donation	45 C.F.R. § 164.512(h)	To procurement organizations.	Donation and transplantation coordination.
Research	45 C.F.R. § 164.512(i)	IRB/Privacy Board waiver; limited data set; or authorization.	Research using de-identified/limited data or authorized PHI.
Serious Threat	45 C.F.R. § 164.512(j)	Serious and imminent threat standard.	Disclosure to prevent harm.
Special Government Functions	45 C.F.R. § 164.512(k)	As permitted for specific government functions.	Military, national security, protective services.
Workers' Compensation	45 C.F.R. § 164.512(l)	As authorized by law; limited to necessary.	Claims administration for work-related injuries.

Marketing	45 C.F.R. § 164.508(a)(3)	Authorization generally required; exceptions may apply.	Promotional communications beyond permitted health-related communications.
Sale of PHI	45 C.F.R. § 164.508(a)(4)	Authorization required; CuraWell does not sell PHI.	Not applicable (no sale).

Appendix B — Patient Rights, Timelines, Fees, and Denial/Review Rules (Detailed)

This Appendix summarizes CuraWell's operational handling of HIPAA rights requests in a compliance-oriented format. CuraWell may require identity verification and may request sufficient information to locate the requested records.

Right	Regulatory Basis	How to Submit	Timeline	Fees / Notes	Denial / Review Rules
Access / Copy of PHI	45 C.F.R. § 164.524	Written request (email or mail). Specify records/date range and preferred format.	No later than 30 days; one 30-day extension with written notice of reasons and expected completion date.	Cost-based fees may apply for copies consistent with HIPAA; electronic copies provided when readily producible.	Denial permitted for limited categories (e.g., certain psychotherapy notes; information compiled for legal proceedings). Review rights may apply depending on denial basis.
Amendment	45 C.F.R. § 164.526	Written request stating amendment sought and reason.	Respond within HIPAA timeframes; written acceptance or denial.	No fee for considering amendment request; reasonable admin controls may apply.	May deny if record not created by CuraWell, not part of designated record set, not available for inspection, or already accurate/complete. Written denial includes how to submit a statement of disagreement.
Accounting of Disclosures	45 C.F.R. § 164.528	Written request specifying time period (up to 6 years).	Provided within HIPAA timeframe; may extend with written notice as permitted.	One accounting per 12 months is free; reasonable fee may apply for additional accountings with advance notice.	Excludes disclosures for TPO and other exclusions under HIPAA.
Restrictions	45 C.F.R. § 164.522	Written request describing requested restriction and to whom it applies.	Respond within reasonable time.	CuraWell not required to agree except certain legally required restrictions; if agreed, CuraWell will honor unless emergency or termination of restriction with notice.	May deny at CuraWell's discretion where permitted; mandatory restrictions honored where applicable.

Confidential Communications	45 C.F.R. § 164.522(b)	Written request specifying alternative address/method and (if relevant) how payment will be handled.	Respond within reasonable time.	No fee; may require reasonable specification.	Must accommodate reasonable requests.
Paper Copy of Notice	45 C.F.R. § 164.520	Request by phone, email, or mail.	Promptly upon request.	No fee.	Not applicable.

Appendix C — Submission Information (Requests, Appeals, and Complaints)

Privacy Officer

Grace Onyango, CuraWell LLC

Mailing Address

CuraWell LLC
8206 Rustic Park Ct
Houston, TX 77083

Phone

+1 (713) 489-4301

Email

info@curawellwoundcare.com

Submitting HIPAA Rights Requests

HIPAA rights requests (access, amendment, accounting, restrictions, confidential communications) must be submitted in writing by email or mail. Requests should include: (a) patient's full name; (b) contact information; (c) date range of records requested; (d) a description of records; and (e) preferred delivery format. CuraWell may request additional information to verify identity or locate records.

Submitting Texas Consumer Privacy Requests (Website Context)

Texas consumer privacy requests regarding Website personal information may be submitted using the same email or mailing address above. CuraWell may require authentication. CuraWell responds within the statutory timelines described in Part I. Appeals may be submitted by replying to CuraWell's decision notice.

Submitting Complaints

You may file a complaint with CuraWell's Privacy Officer using the contact information above. You may also file a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights (OCR). CuraWell will not retaliate against you for filing a complaint.