

GHX Credentialing Site Privacy Notice

This site is operated by Global Healthcare Exchange, LLC and its subsidiaries (collectively, "GHX," "us," or "we"). This Privacy Notice describes our privacy practices for the personal information collected in connection with this site. GHX respects the privacy of your personal information. By using this site, or by providing your information to us or to our service providers, you consent to the collection, use, and disclosure of your information in accordance with this Privacy Notice, the [Terms of Use](#) for this site, and any written agreement(s) executed and in effect between you or your organization and any GHX entity in connection with our products or services (collectively, the "Service Agreement"). The Service Agreement takes precedence over any conflicting terms of this Privacy Notice.

This Privacy Notice applies only to this site. Please review the privacy notice of any other site you may visit, including other GHX applications and the GHX marketing website. See "Links to Other Sites" below.

GHX reserves certain rights with respect to information provided through this site, and requires certain representations about such information, as described in the [Terms of Use](#) posted on this site.

Your rights regarding your personal information may depend on where you live. The effects of laws and regulations described below on any individual may vary according to the circumstances. This Privacy Notice is provided for general informational purposes only and is not intended as legal advice.

For California Residents: This Privacy Notice includes certain general notices and instructions applicable only to California residents under California law, including the California Consumer Privacy Act, as amended by the California Privacy Rights Act, and their implementing regulations (collectively, "CCPA"). For purposes of the CCPA, this Privacy Notice uses the terms "personal information" of California "consumers" as those terms are defined in the CCPA.

Personal Information We Collect

Registration

To complete the registration required to access this site, you must provide your name, business contact information (email, mailing address, and telephone number), company name, and company tax id number.

Credentialing and Other Services

To use the credentialing and other services related to this site, healthcare systems will require you to submit other personal information. This may include, for example, information related to your status for vaccinations, background checks, government sanctions, and education and training courses. GHX does not control what personal information healthcare systems require for credentialing or related services.

You may also submit additional information by updating your profile after registration. Such information may include, for example, your job title, partial date of birth (MM/DD); country, state, and zip code; and applicable credentials (for example, MD, PhD).

To protect your privacy, you should not upload to the site personal details that are not required for the service or by healthcare systems' credentialing requirements, such as criminal background details.

Purchases

This site may offer the opportunity for you to purchase services such as background checks or training from our service providers. If you use a credit card for such purposes, our service providers will collect and use the credit card number and related information to complete the transaction or for verification purposes.

Usage Data

GHX and its service providers also collect certain data that is specific to you, but that does not directly identify you as an individual person. This information tells us about how people use the site so that we can analyze its effectiveness and provide you with a better experience. We collect and use this information through a variety of technologies, including "cookies" and techniques used to track who is reading a web page or email, when, and from what computer, as discussed below.

Personal Information of Others

You may have the opportunity to submit or access personal information of other individuals in your use of this site. For example, if you are an administrator for a GHX customer, you may provide or use information related to credentialing of your organization's personnel. **To protect the privacy of others, you must minimize the personal information you upload, make available to, access, or use in connection with the site to only what is necessary for the services, and notify anyone whose personal information you share with GHX in advance. You are also responsible for your compliance with all applicable laws and the Service Agreement when submitting and processing personal information. GHX disclaims any responsibility or liability arising from your actions and omissions related to personal information.**

For California Residents: Categories of Personal Information Collected

In the past 12 months, GHX has collected, used, and disclosed personal information in connection with this site in the CCPA categories listed in the table below.

CCPA Category	Examples
Identifiers	Name, alias or username, business email, business address, business telephone number, and Internet Protocol ("IP") address
California Customer Records Statute Categories	Name, state of residency/work, business email, business address, business telephone number, IP address
Commercial information	Products or services used
Internet or similar website activity	Information about an individual's interaction with this site
Audio, video, or similar information	Audio recordings of support calls
Sensitive data	Health information, physical location*
Employment information	Employer, job title, completion or passage of background screenings
Inferences drawn from other personal information	Profile reflecting a person's preferences, behavior, etc.

* Please see "Location-Enabled Technology" under "How We Collect Personal Information."

How We Collect Personal Information

GHX collects personal information in connection with this site from the following sources, as described below:

- Directly from you (for example, information you submit on this site);
- Indirectly from you or your devices (for example, from your interaction with this site); and
- From other sources (for example, your employer, hospitals, our service providers, government lists, etc.).

You may provide us and our service providers personal information using this site in a number of ways, for example by registering to use the site, entering that information into data fields on the site or linked service provider sites, uploading documents to the site, emailing us at the email addresses provided on the site, initiating support cases from the site, or completing a survey. If you register with us, we may also obtain information about you from our service providers or your employer.

We also collect usage data related to this site through the technologies described below.

Cookies

This site uses several types of cookies to help its operation. A cookie is a small piece of information sent from a web server to a browser to be stored and read back later by the application. Some cookies are set to expire when you end your session on the site. Others last for longer periods unless you reject or disable them. The site uses browser cookies and may use flash cookies (also called local shared objects), which differ in that flash cookies can store more data, store different data, and store data in a different place on your browser. The types of cookies used on the site include:

Site Performance Cookies

Site performance cookies collect information about how users navigate the site, to help the site's performance. These cookies collect only aggregated, anonymized information, and do not collect information that individually identifies users.

Functionality Cookies

Functionality cookies remember choices you have made to customize your view of parts of site pages (for example, languages, text sizes, fonts, etc.).

The site may use local shared objects, or flash cookies, to personalize your visit by storing your preferences.

You may disable many cookies using your browser settings. Browsers differ, so look at your browser's Help menu to learn how to modify your cookie settings. You can manage flash cookies using the local settings manager native to your operating system or, for earlier flash player versions, using the online settings manager for the flash player. Please note, however, that disabling or deleting cookies may prevent the site from functioning.

Session Storage

This site stores your user identification on your browser during your session to assist with site functionality. This data is deleted when you end your session. You may clear this session storage manually using your browser's settings, which vary by browser, but doing so may prevent the site from functioning properly.

Google Analytics

This site uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). The mobile application uses Google Analytics for Firebase. Google Analytics uses cookies that generate information about your use of the site, which will be transmitted to and stored by Google on servers in the United States. Google uses this information for the purpose of evaluating your use of the site and/or mobile application, compiling reports and providing other services to site and application operators like GHX. Google says that it does not associate the IP address transmitted through Google Analytics by your browser or through Google Analytics for Firebase with other data held by Google.

You can opt out of having your data sent to Google Analytics by downloading and installing the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout> on the Google Analytics site. The add-on does not work for mobile devices.

Location-Enabled Technology

Some electronic devices include location-enabled technology. If you use these devices to access the site, you may be sending the site information about your location. GHX does not use or keep this information except to provide the services. Your device may allow you to disable this technology, although doing so may affect the functionality of some services.

If you obtain a badge for access to a healthcare provider facility, GHX has information about the location where the badge was generated. GHX does not use that location information to track individuals in real time.

How We Use Personal Information

Business Purposes

GHX has in the past 12 months used and disclosed, and continues to use and disclose, personal information for the following business purposes:

- As described to you when collecting your personal information;
- Delivering, providing information about, analyzing, and helping develop GHX products and services and events;
- Providing, supporting, personalizing, analyzing, and developing this site;
- Responding to inquiries and requests;
- Advertising and marketing;
- Helping maintain the safety, security, and integrity of this site, and investigating and helping prosecute wrongdoing;
- Responding to law enforcement requests and as required by applicable law, court order, or governmental regulations; and
- To evaluate or conduct a sale or transfer of assets.

We and our service providers may save your contact information to contact you in the future about our products and services. This contact may be in the form of telephone calls, emails, or mailings. You may opt out of these future contacts as described in “How to Review, Modify, or Delete Your Information” below.

How We Disclose and Transfer Personal Information

As described more fully below, GHX may disclose personal information to the following categories of third parties:

- GHX affiliates and subsidiaries;
- Service providers and business partners;
- Advertising partners;
- Businesses involved in a sale or transfer of assets; and
- Law enforcement and government authorities.

To carry out our services, we share your personal information with healthcare providers and their service providers using our credentialing and other services. We may also share your personal information with your employer to carry out the services and for marketing GHX services to your employer.

GHX, its affiliates and subsidiaries, and our respective service providers and business partners may transfer personal information between them for business purposes. For example, our service providers and business partners may handle background checks, training, data management, email distribution, technical support, marketing, market research, information analysis, or provision of credentialing-related hardware and software. We and our service providers and business partners furnish each other the information needed to perform these and other services, and we work with them to respect and protect your information. The entities with which we share information may be located in the United States or other countries.

We may sell or transfer non-individualized information to third parties, including summary or aggregated anonymous information about all or sub-groups of users of the site, for purposes such as reporting or marketing.

In the event that GHX or some of our assets are sold or transferred or used as security, or to the extent we engage in business negotiations with our business partners, the information collected on this site may be transferred or shared with third parties as part of that transaction or negotiation.

On rare occasions, we may disclose specific information without your consent and without notice to you to comply with laws and regulations, court orders, subpoenas, or lawful discovery requests. Information collected from you may also be used or disclosed to authorities or service providers to prevent, detect, investigate, or respond to security breaches or fraudulent or illegal activity.

International Transfers

This site is hosted and maintained in the United States. If you are visiting this site from a country other than the United States, you should understand that your data submitted through or generated by your use of this site will be transferred to and processed under the laws of the United States, which may not have the same data protection laws as the country in which you are located. This will necessarily result in the transfer of information across international boundaries. By visiting this site and communicating electronically with us, you consent to the transfer and processing of your data as set out in this Privacy Notice in the United States subject to the laws of the United States. If you do not consent to having your information used according with this Privacy Notice, you should not provide your personal

information and should disable all cookies and other technologies as described above under “How We Collect Personal Information” and “How We Use Personal Information.”

How We Retain Personal Information

GHX and its service providers retain and use your information for as long as needed to provide services, respond to communications, comply with legal obligations, resolve disputes, and enforce our agreements.

How We Protect Personal Information

GHX has implemented reasonable physical, technical, and organizational safeguards to help protect your personal information from unauthorized access, acquisition, or disclosure, alteration, or destruction. Although we strive to keep your personal information secure, no safeguards can be guaranteed to be completely secure, so you should exercise caution when transferring personal and other sensitive information over the Internet. Please advise us immediately at the address listed below of any incident involving loss, unauthorized access, or unauthorized disclosure of personal information that is in our custody or control.

Links to Other Sites

The site may contain links to other sites, content, or resources, including links to other sites operated by GHX or other entities. Please note that when you click on one of these links, you will leave this site and will be subject to the policies and privacy practices of the other site, which may differ significantly and be subject to different laws. You should review the policies of other sites you visit. GHX is not responsible for the content, technology, security, or practices of linked sites operated by others, or for your use of linked sites.

Children’s Privacy

The site is not aimed at or intended for children. We do not knowingly collect information from children under the age of sixteen through this site. If we obtain actual knowledge that we have inadvertently collected personal information relating to a child under the age of sixteen, we will delete that information from our records.

How to Review, Modify, or Delete Your Information

For All Users

We want to communicate with you only if you want to hear from us. Please follow the instructions below if you prefer not to receive information from us or would like to update or change your personal information or preferences. Note that a change in or deletion of your information or withdrawal of consent may severely limit our ability to provide you information, products, or services.

- **Profile Information.** You may change or delete your profile information on the site, other than your email address and your company’s federal tax identification number, at any time by logging in with your user id and password. Our services use your email address and your company’s federal tax identification number to help uniquely identify you, so those may not be changed.
- **Communications.** To unsubscribe from receiving periodic emails from us, please follow the instructions for unsubscribing that may be found in emails we send you.
- **Other Requests.** Please use the information under “Contact Us” for other inquiries or requests about your personal information, including viewing, correcting, or deleting your personal information or requesting removal from our contact lists.

After you delete your information or unsubscribe, we may continue to maintain certain information about your transactions or service inquiries for future service and recordkeeping purposes. We may not agree with your request to change your personal information and may instead attach an alternative text to the record in question.

Only you, or someone legally authorized to act on your behalf, may make requests related to your personal information. You may also make requests on behalf of your minor child. Any request related to personal information must provide sufficient information to:

- Reasonably verify you are the data subject or an authorized representative.
- Allow us to properly understand, evaluate, and respond to your request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and connect you with the personal information we have collected. We may request that you submit information to verify your identity or authority using a form or account login we specify. If we are unable to verify your rights, or if it appears your personal information is subject to a legal exemption or exception, we may respond to that effect. We will only use personal information provided in a request to verify your identity or authority to make the request.

If we cannot carry out your request, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

For California Residents

The following supplements the information provided in other parts of this Privacy Notice, and is specific to residents of the State of California.

CCPA Rights

The CCPA provides California residents certain rights to their personal information, including the right to have:

- Information about the categories of information and of sources of information collected; the purposes for which it is collected, used, and disclosed; and the categories of third parties with which it is shared (as discussed above in this Privacy Notice);
- Access to specific information about and portability of their personal information collected;
- Correction of inaccurate personal information;
- Opting out of sales or sharing of personal information, if any;
- Limitation of use or disclosure of sensitive personal information, if any;
- Deletion of personal information; and
- Freedom from discrimination in connection with their exercise of CCPA rights.

Exercising Personal Information Rights

California residents may request exercise of their CCPA rights using the information below under "Contact Us." You may only submit requests for access or data portability twice within a 12-month period.

Do Not Sell or Share Personal Information

In the past year, GHX has not knowingly "sold" or "shared" (as defined in the CCPA) or used for targeted advertising any personal information collected through this site, and does not intend to do so in the future. Please see "How We Collect Personal Information" for how to may disable or opt out of certain technologies.

Do Not Track Requests

Because there is no current industry standard on responding to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about online activities over time, GHX does not respond to them at this time.

California "Shine the Light" Law

California residents who use this site may request from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us at the address provided below.

Updates to this Privacy Notice

GHX may update this Privacy Notice and our site at any time without prior notice to reflect material changes in how we collect, use, share, or store your information, to satisfy legal requirements, or for other business purposes. You should review this Privacy Notice when you visit this site to understand our current practices. The date below shows when this Privacy Notice was last updated.

We encourage you to refer to this Privacy Notice on an ongoing basis so that you understand our current practices. You consent to any changes we make to this Privacy Notice if you continue to use this site after receiving a notice of the change or upon our posting of the new Privacy Notice on this site.

Interpretation of this Privacy Notice

Any interpretation associated with this Privacy Notice will be made by GHX's Legal Department. This Privacy Notice includes examples but is not intended to be restricted in its application to such examples, therefore where the words "including," "include," or "includes" are used, they mean "without limitation."

This Privacy Notice does not create or confer upon any individual any rights, or impose upon GHX any rights or obligations outside of, or in addition to, any rights or obligations imposed by applicable country, state, and other privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Notice and applicable privacy laws, this Privacy Notice will be interpreted, in that case, to give effect to, and comply with, such privacy laws.

Contact Us

If you have questions or comments about this Privacy Notice or this site, please contact us using the information below.

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Last updated: September 17, 2025