

Pathway Diagnostic Laboratories LLC

HIPAA Notice of Privacy Practices

This Notice of Privacy Practices (“Notice”) describes how your identifiable health information—called “Protected Health Information” (“PHI”)—may be used and disclosed by Pathway Diagnostic Laboratories LLC (“Pathway Labs”), and how you can access this information.

Please review this Notice carefully.

Pathway Labs is committed to protecting your privacy and complying with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and applicable Texas and federal privacy laws. PHI includes information in oral, written, and electronic form, such as your test orders, results, and billing information. This Notice explains how we may use or disclose your PHI and outlines your rights regarding that information.

How We May Use or Disclose Your Health Information

Pathway Labs may use or disclose your PHI without requiring written authorization for the following purposes:

1. Treatment, Payment, and Healthcare Operations

We use PHI to perform diagnostic testing ordered by your physician or other authorized healthcare provider (“Practitioner”). Your test results and related information are shared with your Practitioner for treatment purposes.

We also use PHI for billing, claims management, eligibility verification, and other payment-related functions. Additionally, PHI may be used for laboratory operations such as quality assurance, regulatory compliance (e.g., CLIA, COLA), internal audits, and staff training.

2. Business Associates

We may disclose PHI to third parties known as “Business Associates” who help us perform services such as billing, courier transport, IT support, and data storage. All Business Associates are required by law and contract to safeguard your PHI and comply with HIPAA requirements.

3. Individuals Involved in Your Care

With your consent—or if you do not object—we may share PHI with family members, caregivers, or others involved in your healthcare or payment for services.

4. As Required by Law

We may disclose PHI to the extent required by federal or state law, including to comply with a court order, subpoena, or government agency request.

We may also disclose information to prevent or lessen a serious threat to your health or safety or that of another person or the public.

Reproductive Health Information (Texas and Federal Compliance)

Pathway Labs will not use or disclose PHI for the purpose of investigating or penalizing any individual for seeking, obtaining, providing, or facilitating lawful reproductive health care.

We may require a signed attestation that a request for PHI is not for such a prohibited purpose.

5. Public Health Activities

We may disclose PHI to public health authorities for reporting purposes such as communicable disease control or as part of public health investigations.

6. Law Enforcement and Legal Proceedings

We may provide PHI to law enforcement in compliance with warrants, court orders, or as otherwise required by law. PHI may also be disclosed in legal proceedings when necessary to comply with judicial or administrative processes.

7. Research

We may use or disclose PHI for approved research projects when appropriate privacy protections are in place.

8. De-Identified and Limited Data Sets

PHI that has been de-identified (all identifying details removed) is no longer considered PHI and may be used for lawful purposes such as research and analytics. We may also share limited data sets (without identifying information such as names or social security numbers) under data use agreements.

9. Governmental and Oversight Agencies

We may disclose PHI to authorized agencies such as the FDA, CMS, health oversight bodies, organ donation organizations, military authorities, and disaster relief organizations, as permitted by law.

10. Incidental Disclosures

Certain incidental uses of PHI may occur as part of permitted uses (for example, minimal exposure during communication with your provider). We take reasonable steps to safeguard against unauthorized disclosures.

When Authorization Is Required

For any use or disclosure not described above—such as for marketing purposes or the sale of PHI—Pathway Labs will obtain your **written authorization**. You may revoke that authorization in writing at any time, except where PHI has already been used or disclosed.

State Law

As a laboratory based in Texas that receives samples from across the United States, Pathway Labs follows applicable state and federal laws. Where state laws are more restrictive than HIPAA, we will comply with the more protective standard.

Your Rights Regarding Your Protected Health Information

1. Right to Access

You have the right to review and obtain a copy of your PHI that we maintain. If your PHI is maintained electronically, you may request an electronic copy. To request access, contact our Privacy Officer listed below. We may charge a reasonable fee for copies and postage.

2. Right to Amend

If you believe that information in your record is inaccurate or incomplete, you may request an amendment in writing. If we deny your request, we will explain our reason in writing and inform you of your right to submit a statement of disagreement.

3. Right to an Accounting of Disclosures

You may request a list (“accounting”) of certain disclosures of your PHI made by Pathway Labs during the six years prior to your request, excluding disclosures for treatment, payment, or healthcare operations.

4. Right to Request Restrictions

You may ask us to limit certain uses or disclosures of your PHI. While we are not required to agree to most requests, we must honor requests to restrict disclosures to your health plan if you have paid in full out-of-pocket for the related service and disclosure is not required by law.

5. Right to Confidential Communications

You may request that we communicate with you through alternative means (e.g., at a different address or phone number). We will accommodate reasonable requests.

6. Right to a Paper or Electronic Copy of This Notice

You may obtain a paper or electronic copy of this Notice at any time from our website or by contacting us directly.

7. Right to Notification of a Breach

You will be notified if a breach of your unsecured PHI occurs that could compromise the privacy or security of your information.

How to Exercise Your Rights or File a Complaint

To exercise any of the rights listed above or if you believe your privacy rights have been violated, please contact our Compliance Officer at: compliance@pathwaylabsdx.com

You may also file a complaint with the **U.S. Department of Health and Human Services, Office for Civil Rights (OCR)** at <https://www.hhs.gov/ocr/privacy/hipaa/complaints/>.

Pathway Labs will not retaliate against you for filing a complaint.