

Google Health Privacy Policy

The [Google Privacy Policy](#) describes how Google treats personal information when you use Google's products, including information provided when you use Google Health. In addition, the following describes our privacy practices that are specific to Google Health, a service that helps you store and organize your personal health information.

You are in control of your information

1. You control who can access your personal health information. By default, you are the only user who can view and edit your information. If you choose to, you can share your information with others.
2. Google will not sell, rent, or share your information (identified or de-identified) without your explicit consent, except in the limited situations described in the [Google Privacy Policy](#), such as when Google believes it is required to do so by law.
3. You can completely delete your information at any time. Such deletions will take immediate effect in your account, and backup copies of deleted information may persist for a [short time](#). Since deleted data will not be restored, you may want to print information before deleting it.

How Google uses your information

1. To store your information in Google Health, you will need a [Google Account](#). When you create a Google Account, Google asks for your email address and a password, which is used to protect your account from unauthorized access. You can use an existing Google Account or create a new Google Account specifically for this purpose.
2. Google's servers automatically record log information about your use of Google Health (such as number of sign-ins and number of times a link was clicked). This information is temporarily stored in association with your Google Account for two weeks, at which point it is aggregated with other data and is no longer associated with your account. The log information will be used to operate and improve the service and will not be correlated with your use of other Google services.
3. Google will use aggregate data to publish trend statistics and associations. For example, Google might publish trend data similar to what is published in [Google Trends](#). None of this data can be used to personally identify an individual.
4. Certain features of Google Health can be used in conjunction with other Google products, and those features may share information to provide a better user experience and to improve the quality of our services. For example, Google Health can help you save your doctors' contact information into your Google Contact List.

Sharing your information with people and services you trust

1. If you share your information with others, you can view a list of who has access to your information and you can revoke sharing privileges at any time. When you revoke someone's ability to read your health information, that party will no longer be able to read your information, but may have already seen or may retain a copy of the information.
2. Google Health contains a directory of third-party websites that are capable of securely sending information to Google Health. These websites (which may include your medical provider) may give more information about certain conditions or extend the functionality of Google Health in other ways. By creating a link to these websites, you give them permission to send you information such as medical records, prescription histories, or test reports.
3. You can approve access for some of these websites to view your health information. If a website accesses your health information and stores a copy of your information, that copy will be governed by that website's privacy policy. Others at that facility - like an on-call doctor - may be able to view your information. Google is not responsible for the content, performance, or privacy policies of third-party websites.
4. Some of these third-party websites will be covered by federal and state health privacy laws (such as the Health Insurance Portability and Accountability Act, or "HIPAA"), and those laws will govern how they may use and share your information. As a result, you must authorize these providers to send information to your Google Health account. With that authorization, you also give them permission to send certain types of health information (such as mental health records) that are protected by federal and state laws and require special authorization. When you ask

Google to send your health information to others, you will also be giving Google permission to send those certain types of health information.

5. All third-party websites listed in the directory are contractually required to abide by the [Google Health Developer Policies](#), which establish strict privacy standards for how they collect, use, or share your information.

More information

Google adheres to the US Safe Harbor privacy principles. For more information about the Safe Harbor framework or our registration, see the [Department of Commerce's web site](#).

For more information about our privacy practices, go to the [full privacy policy](#). If you have additional questions, please [contact us](#) any time. Or write to us at:

Privacy Matters
c/o Google Inc.
1600 Amphitheatre Parkway
Mountain View CA 94043 (USA)

Google's Privacy Policy

Last modified: March 11, 2009 ([view archived versions](#))

At Google we recognize that privacy is important. This Privacy Policy applies to all of the [products, services and websites](#) offered by Google Inc. or its subsidiaries or affiliated companies except DoubleClick ([DoubleClick Privacy Policy](#)) and Postini ([Postini Privacy Policy](#)); collectively, Google's "services." In addition, where more detailed information is needed to explain our privacy practices, we post supplementary privacy notices to describe how particular services process [personal information](#). These notices can be found in the [Google Privacy Center](#).

Google adheres to the US Safe Harbor Privacy Principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement, and is registered with the [U.S. Department of Commerce's Safe Harbor Program](#).

If you have any questions about this Privacy Policy, please feel free to [contact us](#) through our website or write to us at

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Information we collect and how we use it

We offer a number of services that do not require you to register for an account or provide any personal information to us, such as Google Search. In order to provide our full range of services, we may collect the following types of information:

- **Information you provide** – When you sign up for a [Google Account](#) or other Google service or promotion that requires registration, we ask you for personal information (such as your name, email address and an account password). For certain services, such as our advertising programs, we also request credit card or other payment account information which we maintain in encrypted form on secure servers. We may combine the information you submit under your account with information from other Google services or third parties in order to provide you with a better experience and to improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.

- **Cookies** – When you visit Google, we send one or more cookies – a small file containing a string of characters – to your computer or other device that uniquely identifies your browser. We use cookies to improve the quality of our service, including for storing user preferences, improving search results and ad selection, and tracking user trends, such as how people search. Google also uses cookies in its advertising services to help advertisers and publishers serve and manage ads across the web. We may set one or more cookies in your browser when you visit a website, including Google sites that use our advertising cookies, and view or click on an ad supported by Google’s advertising services.
- **Log information** – When you access Google services, our servers automatically record information that your browser sends whenever you visit a website. These [server logs](#) may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- **User communications** – When you send email or other communications to Google, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.
- **Affiliated Google Services on other sites** – We offer some of our services on or through other web sites. Personal information that you provide to those sites may be sent to Google in order to deliver the service. We process such information under this Privacy Policy. The affiliated sites through which our services are offered may have different privacy practices and we encourage you to read their privacy policies.
- **Gadgets** – Google may make available third party applications through its services. The information collected by Google when you enable a gadget or other application is processed under this Privacy Policy. Information collected by the application or gadget provider is governed by their privacy policies.
- **Location data** – Google offers location-enabled services, such as Google Maps for mobile. If you use those services, Google may receive information about your actual location (such as GPS signals sent by a mobile device) or information that can be used to approximate a location (such as a cell ID).
- **Links** – Google may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our search technology, customized content and advertising. Read more information about [links and redirected URLs](#).
- **Other sites** – This Privacy Policy applies to Google services only. We do not exercise control over the sites displayed as search results, sites that include Google applications, products or services, or links from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.

Google only processes personal information for the purposes described in this Privacy Policy and/or the supplementary privacy notices for specific services. In addition to the above, such purposes include:

- Providing our services, including the display of customized content and advertising;
- Auditing, research and analysis in order to maintain, protect and improve our services;
- Ensuring the technical functioning of our network;
- Protecting the rights or property of Google or our users; and
- Developing new services.

You can find more information about how we process personal information by referring to the supplementary privacy notices for particular services.

Google processes personal information on our servers in the United States of America and in other countries. In some cases, we process personal information on a server outside your own country. We may process personal information to provide our own services. In some cases, we may process personal information on behalf of and according to the instructions of a third party, such as our advertising partners.

Choices for personal information

When you sign up for a particular service that requires registration, we ask you to provide personal information. If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

If we propose to use personal information for any purposes other than those described in this Privacy Policy and/or in the specific service privacy notices, we will offer you an effective way to opt out of the use of personal information for those other purposes. We will not collect or use [sensitive information](#) for purposes other than those described in this Privacy Policy and/or in the supplementary service privacy notices, unless we have obtained your prior consent.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Google features and services may not function properly if your cookies are disabled.

Google uses the [DoubleClick advertising cookie](#) on AdSense partner sites and certain Google services to help advertisers and publishers serve and manage ads across the web. You can view, edit, and manage your ads preferences associated with this cookie by accessing the [Ads Preferences Manager](#). In addition, you may choose to opt out of the DoubleClick cookie at any time by using [DoubleClick's opt-out cookie](#).

You can decline to submit personal information to any of our services, in which case Google may not be able to provide those services to you.

Information sharing

Google only shares personal information with other companies or individuals outside of Google in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.
- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of Google, its users or the public as required or permitted by law.

If Google becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

We may share with third parties certain pieces of [aggregated, non-personal information](#), such as the number of users who searched for a particular term, for example, or how many users clicked on a particular advertisement. Such information does not identify you individually.

Please contact us at the address below for any additional questions about the management or use of personal data.

Information security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Data integrity

Google processes personal information only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services or as otherwise permitted under this Policy. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

Accessing and updating personal information

When you use Google services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Some of our services have different procedures to access, correct or delete users' personal information. We provide the details for these procedures in the specific privacy notices or FAQs for these services.

Enforcement

Google regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or Google's treatment of personal information by [contacting us](#) through this web site or by writing to us at

Privacy Matters

c/o Google Inc.

1600 Amphitheatre Parkway

Mountain View, California, 94043

USA

When we receive formal written complaints at this address, it is Google's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Google and an individual.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent, and we expect most such changes will be minor.

Regardless, we will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy

changes). Each version of this Privacy Policy will be identified at the top of the page by its effective date, and we will also keep [prior versions](#) of this Privacy Policy in an archive for your review.

If you have any additional questions or concerns about this Privacy Policy, please feel free to contact us any time through this web site or at

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Google Health Integration Policies

DATA USE POLICY

The Google Health APIs enable institutions to send and access health information from users' Google Health profiles after permission has been granted. Google takes the privacy of its users' data very seriously, and all institutions wishing to connect to Google Health must abide by the policies outlined below, as well as applicable law.

If your institution desires to send or retrieve health information from a Google Health profile, you must:

- Maintain a privacy policy that is easily accessible on your landing page. Your privacy policy should be designed to be read and understood by the typical user. The policy must contain any and all disclosures required by law, including but not limited to:
 - What data you collect and how it is stored on your servers.
 - Whether and how you are sharing data with third parties.
 - In what form data is being shared with third parties (anonymous, semi-anonymous, etc).
 - How you are using Google Health user data (including whether or not it will be used for advertising purposes).
 - If you are a HIPAA covered entity, you may comply with this policy by complying with HIPAA's privacy notice requirements.
- Provide a way for users to unlink their Google Health profile.
- Have easily accessible and readable Terms & Conditions and contact information.
- Notify Google if you experience a breach or misuse of information in connection with transmission of data to Google Health.
- Comply with the [Google Software Principles](#).

An institution sending data to a Google Health profile must not:

- Share your private certificate or a Google Health user's AuthSub or OAuth token with any third party.
- Employ aggressive advertising tactics such as popups and popunders.

If your institution desires to retrieve health information from a Google Health profile, in addition to meeting the above conditions you must also:

- Only share Google Health user data with additional parties with explicit opt-in consent from the user, or in the following limited circumstances:
 - When provided to your subsidiaries, affiliated companies, subcontractors, or agents for the purpose of processing personal information on your behalf, and only if you require that these parties agree to process such information based on your instructions and in compliance with your privacy policy and any other appropriate confidentiality and security measures (e.g., a security vendor for purposes of

evaluating the security of your systems, or a backup storage service for the purposes of storing backup data on your behalf only).

- You have a good faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process, or enforceable governmental request, (b) enforce applicable terms of service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security, or technical issues, or (d) protect against imminent harm to the rights, property, or safety of your users or the public as required or permitted by law.
- Clearly inform the user during the account creation process if profile information will be used for targeted advertising or research purposes. If so, the user's consent is required.
- Allow users to permanently delete and purge the data derived from their Google Health profiles; backup copies may exist for a short time.
- Require users to agree with your privacy policy and only use Google Health user data for the purposes disclosed in your privacy policy. Also, you must notify both Google and your users of any changes in your privacy policy at least 30 days in advance.
- Obtain consent prior to implementing material changes. Institutions are prohibited from using any user data for purposes that the user did not already consent to. Should your institution come up with a new application or use for any user data, the user's opt-in consent must be obtained before using the data in that manner.
- Clearly label all advertising.
- Notify Google if you experience a breach or misuse of information which includes any data from Google Health.

An institution retrieving health information from a Google Health profile must not:

- Sell user data to a third party, whether personally identifiable or in aggregate form.
- Share your private certificate or a Google Health user's AuthSub token with any third party.
- Employ aggressive advertising tactics such as popups and popunders.

An institution intending to serve as a health data provider must be able to send personal health information into a user's Google Health profile. If desired, you can allow users the option to export their Google Health information to your institution.

An institution intending to serve as a third-party service must offer a customized service relevant to the types of data that Google Health supports. You may not access a profile if it will not be directly used to provide such customized services.

Please note that if you are subject to the Health Insurance Portability and Accountability Act (HIPAA), either as a covered entity or a business associate, your institution must comply with all of the HIPAA requirements. To the extent that provisions of HIPAA that apply to your services are inconsistent with the above policies, the HIPAA requirements shall apply. If permitted by law, you must notify us if your organization becomes the subject of a HIPAA investigation.

UI GUIDELINES

The landing page (the target of the "Link to Profile" button) must:

- Prominently show the name of your organization or application (which must match the name in the Google Health directory).
- Show the official Google Health logo.
- Describe the integration and highlight its benefits.
- Have a link to your privacy policy (which must match the link that will be viewed within the long description on the Google Health services directory page).

- Have a link to go back to Google Health; the text for the link should read "Go back to Google Health" and the link should be equivalent to the browser's "back" button.
- Have a single prominent link to either begin the registration process for your website, or commence linking with Google Health.
- Not have teasers or ads for other services (including ones offered by the company).

Your website must also have a clearly visible link called "Unlink from Google Health" that allows users to unlink your website from their Google Health profiles. You must also allow users to re-link registered accounts to their Google Health profiles.

If your institution reads from Google Health profiles, it must either automatically retrieve the latest data from the profiles, or automatically upon login, or allow the user to initiate another read to retrieve any updates to the Google Health profile.

DATA SECURITY

You must use generally adopted industry web security standards for controlling access to your servers and user accounts. We suggest reviewing the [HIPAA security rule](#) for a good list of issues to consider when designing your security infrastructure. While not all the items in the rule will apply to all companies, most of the items they discuss are good security principles for any web service that holds user data. In addition, you must comply with all technical specifications provided in the [Google Health API documentation](#).

NOTICES

Google Health gives integrated institutions the opportunity to provide notices to users. To ensure a positive user experience, you must abide by these guidelines:

- Promotional* notices must be clearly labeled as promotional.
- Promotional notices may be sent a maximum of once per week per user and also give the user the option to opt-out of receiving such notices.
- Links in notices must open in a new window or provide a working back button.

* Definition of promotional: Promotional materials are any materials that promote a product or service - such as encouraging the user to purchase or "ask their doctor" about a specific item. This includes coupons and sale announcements, as well as drug advertisements.

LISTINGS IN THE GOOGLE HEALTH DIRECTORY

The Google Health Directory lists integrations with Google Health that can provide users with either online access to their personal health information, or customized functionality based on their medical information relevant to Google Health. If you are an institution that wants to be included in the directory, your integration must first be reviewed and approved by the Google Health team per all policies described in this document. You will also be required to agree to the Terms of Service.

To submit your health data provider integration for review, please fill out [this form](#).

To submit your third-party service integration for review, please fill out [this form](#).

ONLINE PHARMACY QUALIFICATION PROCESS

Online pharmacies will be permitted in the Google Health Directory only after completing Google's online pharmacy qualification process:

http://www.google.com/adwords/pharmacy_qualification.html

The requirements are the same as those of online pharmacies utilizing Google AdWords.

BRANDING GUIDELINES FOR GOOGLE HEALTH INTEGRATIONS

Guidelines for how to promote or describe your integration:

By listing yourself as a Google Health integrated service, Google does not endorse or otherwise affiliate itself with your website or institution. You may not display the Google Health logo or

descriptive web copy in a way that implies such an endorsement. Your website or institution should only display the Google Health logo or descriptive web copy to emphasize a technical integration.

In describing your website, refrain from using words like "partner", "joint developer", or "platform or application provider". Instead, please refer to your institution as a Google Health data provider or Google Health integrated service (depending on which integration type was approved).

Google Health Logo Use and Guidelines:

If you've successfully integrated with Google Health and remain in good standing, please display the Google Health logo on your website. This logo informs prospective users that you are integrated with Google Health. You may not alter the size, shape, color, or any other aspect of the Google Health logo provided by Google. Any use of the Google Health product name, logo, or associated imagery not explicitly authorized in this section is strictly prohibited.

The logo must:

- Be clearly legible and visible so that it stands out against the background.
- Remain in its natural horizontal state, and not be rotated.
- Not be the first or largest logo on the page. The Google Health logo should not be larger than your own logo.

Placement of Google Health logo on your website:

These following are the areas on your website where you can use the Google Health Logo:

- Sign-in pages used during the Google Health linking process.
- Pages used for linking and unlinking to Google Health.
- Pages used for updating Google Health settings. (e.g. Token Status, Last Send Date, etc)
- Any notices or messages that your website displays related to Google Health.
- Product description or overview pages for services that integrate with Google Health.
- Next to a promotional item showcasing Google Health integration on your corporate homepage.

Use of the Google Health trademark:

Treat the phrase "Google Health" as you would a logo, following these simple guidelines:

- Review Google's Trademark Guidelines for information on using Google's trademarks.
- Don't use it as a verb, adjective, or noun.
- Don't translate it into any language other than English.
- Don't modify it through hyphenation, combination, or abbreviation.
- Don't shorten or abbreviate it, or turn it into an acronym.

Trademarks are important business assets that decrease in value when used incorrectly. When creating your integrated service, keep in mind that you are fully responsible for your website's content and for adhering to our Terms and Conditions, which prohibit intellectual property infringement.

For more information on branding and trademarks, see Google's corporate Branding Guidelines at <http://www.google.com/permissions/guidelines.html>.

Screenshots:

You may not capture or reproduce Google Health screenshots and list them on your website without written approval from Google.

Guidelines around reproducing the Google Health logo and copy in sales materials:

You may not reproduce the Google Health logo or describe the service and use the Google trademark name in any sales materials or marketing collateral without written permission from Google first. Any inclusion of the Google Health logo in your marketing materials must be approved in advance in writing by Google. This includes online and offline advertising and collateral, such as case studies, client and referral lists, sales presentations, print, broadcast, outdoor or online ads, product demos, signage, trade show booths.

Google Health will occasionally highlight certain integrations in our own online and offline marketing materials. Integrations that are promoted in this way will not receive any form of preferential treatment in the actual Google Health Directory or our search results.

Guidelines for Press Releases:

Google generally does not issue releases to announce integrations. Any institution wishing to issue a press release that refers to Google or Google Health by name must get prior approval in writing from Google's health team staff and public relations department.

For more information on promotions, see Google's branding guidelines at <http://www.google.com/permissions/>.

Please note that we reserve the right to disapprove any listing for any reason and to modify or amend our policies at any time.

July 15, 2009