



**Hopedale Medical Complex**  
**PRIVACY POLICY**  
**HMC Patient Communications**

**Last Updated May 5, 2026**

HMC PATIENT COMMUNICATIONS (the "Service") is a text-message communication tool provided to You by Hopedale Medical Complex ("HMC"). HMC is committed to protecting Your privacy. This privacy statement describes HMC's privacy practices in relation to Your use of the Service, including any data that may be collected by HMC through Your participation in the Service. "We," "Us," and "Our" refer to HMC and "You" and "Your" refer to you (the patient or other authorized recipient). We do not use or disclose Your information except as described in this privacy statement. This Privacy Policy is intended to be read alongside the HMC Patient SMS Terms & Conditions (<https://hopedalemc.com/sms-terms-patient>).

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**INTRODUCTION**

The Service is a text-message communication tool from HMC that enables 1-to-1 SMS conversations between an HMC patient and an individual HMC clinician or clinical support staff member. Messages are sent and received from the Teams Phone number assigned to the individual employee.

The Service is hosted and transmitted by Us using Microsoft Corporation. You should review Microsoft's terms and conditions of use and privacy policy, which are available on Microsoft's website. It is important for You to understand how the information that You submit, receive, and reply to in the Service is used by Us.

The Service is not a tool for medical advice or emergencies. Always seek the advice of Your physician or other qualified health provider with any questions You may have regarding a medical condition. **Do not use SMS for medical emergencies. If You are experiencing a medical emergency, call 911 or go to the nearest emergency department.** SMS messages travel over public wireless carrier networks and are not encrypted end-to-end. You should not include sensitive medical information in Your SMS replies. You agree that the Service and the information provided by the Service do not constitute the practice of medicine or any medical, nursing, or other professional health care advice, diagnosis, or treatment.

## **USING THE SERVICE**

To enroll You in the Service, We may use personal data such as name, date of birth, e-mail address, mobile phone number, and language preference. Consent to receive messages is collected at patient registration via a signed HMC Patient Communications Authorization, retained in Your electronic health record. You may be asked for additional information needed for an appointment or care episode, such as insurance information, identification, and healthcare consent forms. These are often automatically associated with Your record in HMC's electronic health record (EHR).

## **SHARING HEALTH DATA**

Except as contained in this privacy policy, We will not share Your health data with any third parties.

## **ACCESS AND CONTROLS**

The Service maintains a record of message transmission and delivery for each participant. Authorized HMC personnel can examine those records for compliance, audit, and operational purposes. As a participant in the Service, You may request access to information We hold about You, request correction of information that is inaccurate, or request removal of Your mobile number from the Service directory by contacting Us as set forth in the Complaint Process below. You may also exercise rights under HIPAA's Privacy Rule with respect to Protected Health Information; see Section 8 below.

## **EMAIL AND TEXT COMMUNICATIONS**

We will use the mobile phone number You provide to the Service or to Your healthcare provider to deliver Service messages — appointment confirmations and reminders, care coordination, prescription pickup notices, and non-urgent follow-up. We may also use email

addresses You provide to communicate about the Service itself, such as enrollment confirmations or service notifications. We may also use text and email to obtain or confirm appropriate documentation for Your visit.

**Message frequency is variable and care-driven.** There is no fixed schedule.

**Message and data rates may apply.** Standard messaging and data charges from Your mobile carrier may apply to messages received from HMC. HMC does not charge You for messages.

**You may opt out of the Service at any time by replying STOP to any Service message.** After processing, You will no longer receive messages from the Service, and You will receive a single confirmation message acknowledging Your opt-out. The keywords OPTOUT, CANCEL, END, QUIT, UNSUBSCRIBE, REVOKE, and STOPALL are also recognized as opt-out commands. To re-subscribe, reply START to the number that previously messaged You, or contact Us using the Complaint Process below. **Reply HELP at any time for help.**

## **COLLECTION OF PERSONAL AND USAGE INFORMATION**

Any data that You provide to the Service or that HMC collects to operate the Service ("Personal Health Information" or "Personal Information") is stored in HMC's secure systems. Some Personal Information is also stored in or transferred to Your electronic health record maintained by HMC, where it is treated as part of Your medical record and is governed by HMC's Notice of Privacy Practices, available at [www.hopedalem.com](http://www.hopedalem.com).

The Service uses Personal Information collected from You, including Personal Health Information, to provide the Service as described in this policy. HMC restricts access to Personal Information stored in Our systems to authorized personnel for legitimate operational, clinical, and compliance purposes, and it is not accessible by third parties except as described in this Privacy Policy.

We may also collect information about Your participation in the Service. For example, We may collect message delivery status, timestamps, the wireless carrier on which Your message was delivered, and standard metadata that Your carrier or device transmits with each message. This information is referred to as "Usage Information." Usage Information is used to operate, audit, troubleshoot, and improve the Service.

## **HOW YOUR PERSONAL INFORMATION AND USAGE INFORMATION ARE USED AND SHARED**

The Service uses Your Personal Information and Usage Information to provide You the Service and to enable the authorized communications described in this Privacy Policy. Personal Information is used by individual HMC clinicians and clinical support staff to send appointment confirmations and reminders, care coordination messages, prescription pickup notices, and non-urgent follow-up; to receive Your replies; and to maintain Your communication preferences in HMC's EHR. Information You exchange with an HMC clinician through the Service may be entered into Your medical record.

We use Microsoft Corporation as Our SMS service provider for the Service. Microsoft processes message delivery on Our behalf under contractual obligations to protect Your

information and use it only for the purposes described in this Notice. Microsoft's own handling of the information it processes is governed by its own privacy policy.

We and Our suppliers may also use aggregated and de-identified Usage Information to improve Our respective products and services. This aggregated information is not associated with any individual account.

Except as set forth in this statement, We will not share Your Personal Information and Usage Information in personally identifiable form with any other party without Your consent, unless We are required to do so (1) to comply with the law; (2) to prevent, report, or investigate illegal activity; or (3) to protect Our rights or property (including the enforcement of Our agreements).

**All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.**

## **HIPAA**

Hopedale Medical Complex is a Covered Entity under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Personal Information collected and exchanged through the Service may constitute Protected Health Information ("PHI") subject to HIPAA's Privacy Rule and Security Rule. HMC's full HIPAA privacy practices and Your rights with respect to PHI are described in HMC's Notice of Privacy Practices, available at [www.hopedalemc.com](http://www.hopedalemc.com).

The Service operates within the **Appointment Reminders** and **Treatment Alternatives** uses described in HMC's Notice of Privacy Practices, which HIPAA permits without a separate authorization. By providing Your mobile phone number to HMC for purposes of the Service, You are also exercising Your right under HIPAA's Privacy Rule to receive confidential communications from HMC at an alternate location of Your choosing.

Because SMS messages travel over public wireless carrier networks and are not encrypted end-to-end during carrier transmission, HMC clinicians limit the clinical detail in SMS messages and avoid including sensitive PHI by text. **You should not include sensitive medical information in Your SMS replies.** For sensitive clinical communication, use the patient portal or call HMC directly.

HMC has executed a Business Associate Agreement with Microsoft Corporation consistent with HIPAA requirements.

## **CCPA**

HMC complies with the California Consumer Privacy Act (CCPA) where it applies to You. You have a right to know what personal information is collected about You and how it is used or shared. **HMC does not sell any of Your personal information.** If You want to know more, You can email Your question to [HIPAAOfficer@hopedalemc.com](mailto:HIPAAOfficer@hopedalemc.com). We will use information in the Service to verify that You are the person requesting information about You.

You also have a right to delete personal information that We hold in the Service. If You want to request deletion, You can email Your request to [HIPAAOfficer@hopedalemc.com](mailto:HIPAAOfficer@hopedalemc.com). We may not be able to delete information held in Your medical record where retention is required by law, by HMC's record-retention obligations as a Covered Entity, or where the information is

otherwise outside Our control.

You may use an agent to request information from Us under this section. Please have any agent contact Us at [HIPAAOfficer@hopedalemc.com](mailto:HIPAAOfficer@hopedalemc.com) and We will provide instructions regarding how an agent may act on Your behalf.

We will not discriminate against You in terms of price or service when You exercise Your privacy rights under CCPA.

## **HOW WE USE COOKIES**

The Service is delivered by SMS and does not itself place cookies on Your device. HMC's web properties and patient portal that complement the Service may use cookies and are governed by their own privacy policies; review those services' policies separately.

## **COMPLAINT PROCESS**

If You have a complaint or problem related to the Service, or any questions regarding Our privacy practices, You may write, call, or email HMC's HIPAA Privacy Officer at:

### **Hopedale Medical Complex**

Attn: HIPAA Privacy Officer  
107 Tremont Street  
Hopedale, IL 61747  
United States  
Telephone: (309) 449-4011  
Email: [HIPAAOfficer@hopedalemc.com](mailto:HIPAAOfficer@hopedalemc.com)

For all other questions about the Service, You may also contact Hopedale Medical Complex at (309) 449-3321.

If You have contacted HMC's Privacy Officer about a privacy-related concern and You do not believe Your problem has been addressed, You may file a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, in accordance with HIPAA. HMC will not retaliate against You for filing a complaint.

## **CHANGES TO OUR PRIVACY STATEMENT**

We may update this Privacy Policy from time to time. When We do, We will revise the "Last Updated" date at the top of the privacy statement. You are responsible to review this privacy policy each time before using or continuing to participate in the Service. By participating in the Service, You consent to the most recent version of this Privacy Policy.

*Related: HMC Patient SMS Terms & Conditions (<https://hopedalemc.com/sms-terms-patient>) | HMC Notice of Privacy Practices (<https://www.hopedalemc.com>)*