

# TRINITY CONNECTION PRIVACY POLICY

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[trinityconnection.com](http://trinityconnection.com)

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# 1. INTRODUCTION AND SCOPE

Trinity Connection ("**Company**," "**we**," "**us**," or "**our**") is a medical-legal chronology services company that provides litigation support to personal injury and mass tort law firms. This Privacy Policy ("**Policy**") describes how we collect, use, disclose, retain, and protect information obtained through our website at trinityconnection.com (the "**Website**") and in connection with our services.

This Policy applies to all visitors, clients, prospective clients, and users of the Website and our services. By accessing or using the Website, you acknowledge that you have read, understood, and agree to the practices described in this Policy.

**Trinity Connection is not a law firm and does not provide legal services.** We are a professional services company that prepares medical-legal chronologies and related litigation support materials on behalf of, and at the direction of, our law firm clients. Nothing in this Policy constitutes legal advice, and no attorney-client relationship is created by your use of the Website or engagement of our services.

This Policy should be read in conjunction with our Terms of Service and any applicable Business Associate Agreement ("**BAA**") executed between Trinity Connection and its clients.

# 2. INFORMATION WE COLLECT

We may collect and process the following categories of information in connection with the Website and our services:

## **2.1 Personal Information**

We collect personal information that you voluntarily provide to us through contact forms, intake forms, service inquiries, and direct communications.

This may include:

- Full name
- Email address
- Phone number
- Business or law firm name
- Job title or professional role

## **2.2 Business Information**

In the course of providing our services, we may collect business-related information from our law firm clients, including:

- Law firm name, address, and contact details
- Case reference numbers and identifiers
- Engagement and project details
- Billing and invoicing information

## **2.3 Protected Health Information (PHI)**

In our capacity as a Business Associate under the Health Insurance Portability and Accountability Act of 1996 ("**HIPAA**"), we receive Protected Health Information from our client law firms for the purpose of preparing medical-legal chronologies. PHI may include:

- Medical records and clinical documentation
- Treatment histories and provider notes
- Billing records and insurance information
- Diagnostic and laboratory results

- Other health-related information as provided by the client law firm

**PHI is not collected directly from patients or individuals through the Website.** All PHI is received exclusively from client law firms pursuant to executed Business Associate Agreements.

## **2.4 Technical Information**

When you visit the Website, we may automatically collect certain technical information, including:

- Internet Protocol (IP) address
- Browser type and version
- Operating system
- Device identifiers
- Referring URLs and exit pages

## **2.5 Usage Data**

We may also collect information about how you interact with the Website, including:

- Pages visited and content viewed
- Time spent on individual pages
- Click patterns and navigation paths
- Date and time of access

# **3. HOW WE COLLECT INFORMATION**

We collect information through the following methods:

### **3.1 Directly from You**

We collect information that you provide directly to us when you complete contact forms or intake forms on the Website, send us an email, communicate with us by telephone, or otherwise submit information in connection with a service inquiry or engagement.

### **3.2 From Client Law Firms**

We receive medical records, case materials, and related documentation from our client law firms pursuant to executed Business Associate Agreements. This information is provided solely for the purpose of enabling Trinity Connection to perform medical-legal chronology services and related litigation support.

### **3.3 Automatically Through Cookies and Similar Technologies**

We use cookies and similar tracking technologies to collect technical information and usage data when you visit the Website. For additional information regarding our use of cookies, please refer to Section 6 of this Policy.

### **3.4 Through Third-Party Analytics Platforms**

We use third-party analytics services to help us understand how visitors use and interact with the Website. These services may collect information sent by your browser as part of a web page request, including cookies and your IP address. Please refer to Section 7 of this Policy for further details.

# 4. HOW WE USE YOUR INFORMATION

We use the information we collect for the following purposes:

- **Service Delivery:** To provide medical-legal chronology services, including the preparation of chronologies, summaries, and related litigation support work product for our client law firms.
- **Client Communications:** To communicate with clients and prospective clients regarding service inquiries, project status, deliverables, and related matters.
- **Service Inquiries and Engagements:** To process and respond to service inquiries, proposals, and new client engagements.
- **Website Improvement:** To improve the functionality, content, and user experience of the Website.
- **Legal Compliance:** To comply with applicable federal, state, and local laws, regulations, and legal processes.
- **Terms Enforcement:** To enforce our Terms of Service and other applicable agreements.
- **Internal Operations:** For internal business operations, including quality assurance, training, record-keeping, and administrative purposes.

**PHI Use Limitation:** Protected Health Information is used solely for the purposes specified in the applicable Business Associate Agreement. We do not use PHI for any purpose outside the scope of the BAA, including marketing, sales, or any purpose unrelated to the provision of medical-legal chronology services.

# **5. PROTECTED HEALTH INFORMATION (PHI) AND HIPAA COMPLIANCE**

Trinity Connection takes its obligations regarding Protected Health Information seriously. The following describes our practices and commitments with respect to PHI and HIPAA compliance:

## **5.1 Business Associate Status**

Trinity Connection operates as a **Business Associate** under HIPAA, as defined in 45 C.F.R. § 160.103. We are not a Covered Entity. We receive and process PHI on behalf of, and at the direction of, our client law firms, which may themselves be Business Associates or act on behalf of Covered Entities.

## **5.2 Business Associate Agreements**

All PHI is received exclusively from client law firms pursuant to executed Business Associate Agreements. These agreements define the permitted uses and disclosures of PHI, establish the obligations of each party, and ensure compliance with applicable HIPAA requirements.

## **5.3 Permitted Uses of PHI**

PHI is used solely for the purpose of preparing medical-legal chronologies and related litigation support services as specified in the applicable BAA. Trinity Connection does not use PHI for any purpose beyond the scope of the agreement.

## **5.4 Minimum Necessary Standard**

Trinity Connection applies the HIPAA "minimum necessary" standard, as set forth in 45 C.F.R. § 164.502(b), to all uses, disclosures, and requests for

PHI. We limit access to PHI to those workforce members who require such access to perform their assigned duties in connection with the applicable engagement.

## **5.5 No Direct Collection from Individuals**

PHI is not collected directly from patients, healthcare consumers, or individuals through the Website. All PHI is provided by client law firms in connection with specific legal matters.

## **5.6 Administrative, Physical, and Technical Safeguards**

Trinity Connection maintains administrative, physical, and technical safeguards for PHI in accordance with the HIPAA Security Rule (45 C.F.R. Part 164, Subpart C). These safeguards are designed to ensure the confidentiality, integrity, and availability of all electronic PHI ("**ePHI**") that we create, receive, maintain, or transmit.

## **5.7 Breach Notification**

In the event of a breach of unsecured PHI, Trinity Connection complies with the HIPAA Breach Notification Rule (45 C.F.R. §§ 164.400-164.414). We will notify affected client law firms without unreasonable delay and in no case later than sixty (60) calendar days after discovery of the breach, unless a shorter period is specified in the applicable BAA.

## **5.8 Prohibition on Sale and Marketing Use**

Trinity Connection does not sell PHI. PHI is never used for marketing purposes or for any purpose outside the scope of the applicable BAA.

## 5.9 De-Identification Practices

Where applicable, Trinity Connection follows the guidance issued by the U.S. Department of Health and Human Services ("**HHS**") regarding the de-identification of protected health information under the HIPAA Privacy Rule.

## 5.10 Workforce Training

All Trinity Connection workforce members who handle or have access to PHI receive training on HIPAA requirements, PHI handling procedures, and the Company's privacy and security policies. Training is provided upon hire and on a recurring basis thereafter.

# 6. COOKIES AND TRACKING TECHNOLOGIES

The Website uses cookies and similar tracking technologies to enhance your browsing experience and to collect information about how the Website is used.

## 6.1 Types of Cookies Used

Cookie Type	Purpose
<b>Essential / Functional Cookies</b>	These cookies are necessary for the Website to function properly. They enable core functionality such as page navigation, access to secure areas, and form submissions. The Website cannot function properly without these cookies.
<b>Analytics Cookies</b>	These cookies help us understand how visitors interact with the Website by collecting and reporting information about usage patterns. Data collected through analytics

Cookie Type	Purpose
	cookies is aggregated and anonymous.
<b>Performance Cookies</b>	These cookies collect information about how the Website performs, including page load times and error reports. They help us improve the speed, reliability, and overall performance of the Website.

## 6.2 Third-Party Cookies

The Website may use third-party cookies, including those set by Google Analytics, to collect and analyze usage data. These cookies are governed by the privacy policies of the respective third-party providers.

## 6.3 Managing Cookies

You may manage or disable cookies through your browser settings. Most web browsers allow you to view, delete, and block cookies from websites. Please note that disabling or blocking certain cookies may affect the functionality of the Website and may prevent you from accessing certain features.

## 6.4 Cookies and PHI

**No cookies or tracking technologies used on the Website are used to collect, store, or track Protected Health Information.**

# 7. ANALYTICS AND TRACKING

## 7.1 Analytics Platforms

Trinity Connection may use Google Analytics or similar analytics platforms to collect aggregated, non-personally-identifiable information about Website

usage. These tools help us understand visitor behavior, measure the effectiveness of our content, and improve the overall user experience.

## **7.2 Data Collected Through Analytics**

Analytics tools may collect information including, but not limited to, the number of visitors, pages viewed, session duration, geographic location (at the city or regional level), traffic sources, and device information. This data is collected in an aggregated and non-identifiable format.

## **7.3 Purpose**

Analytics data is used solely for the purposes of improving Website performance, optimizing content and navigation, and understanding visitor engagement patterns.

## **7.4 Anonymization and Pseudonymization**

Where available, we enable IP anonymization or pseudonymization features within our analytics platforms to further protect visitor privacy.

## **7.5 Analytics and PHI**

**No analytics tools are used to track, process, or collect Protected Health Information.** Analytics data collection is limited to Website usage information and does not extend to any systems or platforms used for the processing of PHI.

# 8. THIRD-PARTY SHARING AND DISCLOSURE

## 8.1 Categories of Third Parties

We may share information with the following categories of third parties in connection with our business operations:

- **Service Providers:** Companies that provide services on our behalf, such as hosting, information technology support, and data storage.
- **Technology Vendors:** Providers of software, platforms, and tools used in connection with our operations and Website.
- **Payment Processors:** Third-party payment processing services used to process client payments.
- **Professional Advisors:** Legal counsel, accountants, auditors, and insurance providers, as necessary.

## 8.2 PHI and Third Parties

All third parties that receive, access, or process PHI on behalf of Trinity Connection are required to execute Business Associate Agreements or appropriate data protection agreements, as applicable, before any PHI is disclosed.

## 8.3 Circumstances of Disclosure

We may disclose information under the following circumstances:

- **With Consent:** Where you have provided your consent to the disclosure.
- **Legal Process:** To comply with a subpoena, court order, legal process, or governmental request.

- **Protection of Rights and Safety:** To protect the rights, property, or safety of Trinity Connection, our clients, or others, as permitted by law.
- **Business Transfers:** In connection with a merger, acquisition, reorganization, sale of assets, or bankruptcy, subject to confidentiality obligations and applicable law.

## **8.4 No Sale of Information**

**Trinity Connection does not sell personal information or PHI to any third party.**

## **8.5 No Third-Party Marketing**

**Trinity Connection does not share personal information with third parties for their own marketing purposes.**

# **9. DATA RETENTION**

## **9.1 General Website Data**

Personal information and usage data collected through the Website is retained for a reasonable period consistent with our business needs, the purpose for which it was collected, and applicable legal requirements.

## **9.2 Protected Health Information**

PHI is retained and disposed of in accordance with the terms of the applicable Business Associate Agreement, HIPAA requirements (including 45 C.F.R. § 164.530(j)), and applicable state and federal retention laws. Retention periods may vary based on the nature of the engagement, the type of records, and jurisdictional requirements.

## **9.3 Client Business Records**

Client business records, including engagement files, correspondence, and invoicing records, are retained in accordance with applicable professional standards and legal requirements.

## **9.4 Return or Destruction Upon BAA Termination**

Upon termination or expiration of a Business Associate Agreement, PHI is returned to the client law firm or securely destroyed, as specified in the applicable BAA. Where return or destruction is not feasible, protections under the BAA are extended to any retained PHI.

## **9.5 Secure Destruction Methods**

PHI is destroyed using secure methods that render the information unreadable, indecipherable, and otherwise irretrievable. Destruction methods may include, as appropriate:

- Physical shredding of paper records using cross-cut shredders
- Degaussing of magnetic media
- Certified electronic deletion or overwriting of electronic records
- Secure destruction by certified third-party vendors

# **10. DATA SECURITY**

Trinity Connection maintains a comprehensive information security program designed to protect the confidentiality, integrity, and availability of all information we collect and process, with particular emphasis on the security of Protected Health Information. Our security measures include, but are not limited to, the following:

## **10.1 Encryption**

Data is encrypted in transit using Transport Layer Security (TLS/SSL) protocols and at rest using Advanced Encryption Standard (AES-256) or equivalent encryption technologies.

## **10.2 Access Controls**

We implement role-based access controls to ensure that access to information, including PHI, is limited to authorized workforce members on a need-to-know basis.

## **10.3 Multi-Factor Authentication**

Multi-factor authentication is required for access to all systems and platforms that contain or process Protected Health Information.

## **10.4 Security Assessments**

We conduct regular security assessments, vulnerability testing, and risk analyses to identify and address potential threats to the security of our information systems.

## **10.5 Incident Response**

We maintain documented incident response and breach notification procedures that are designed to ensure timely identification, containment, and reporting of security incidents in accordance with HIPAA and applicable law.

## **10.6 Physical Security**

Physical security measures are maintained at all facilities where information is stored or processed, including access restrictions, surveillance, and environmental controls.

## **10.7 Workforce Screening and Agreements**

All workforce members undergo background checks prior to employment and are required to execute confidentiality and non-disclosure agreements as a condition of engagement.

## **10.8 Security Awareness Training**

Trinity Connection provides ongoing security awareness training to all workforce members, covering topics including phishing prevention, data handling procedures, password security, and incident reporting.

## **10.9 Limitation of Security Measures**

**No method of electronic transmission or data storage is guaranteed to be 100% secure.** While we strive to use commercially reasonable measures to protect your information, we cannot guarantee absolute security. In the event of a security incident, we will respond in accordance with our incident response procedures and applicable legal requirements.

# **11. YOUR RIGHTS AND CHOICES**

Subject to applicable law and certain limitations, you may have the following rights with respect to your personal information:

## **11.1 Access**

You may request access to the personal information that we hold about you. We will respond to verified requests within a reasonable timeframe and in accordance with applicable law.

## **11.2 Correction**

You may request that we correct or update personal information that is inaccurate or incomplete.

## **11.3 Deletion**

You may request the deletion of your personal information, subject to our legal and contractual obligations to retain certain records. We will inform you if we are unable to honor a deletion request and the basis for that determination.

## **11.4 Marketing Opt-Out**

You may opt out of receiving marketing communications from Trinity Connection at any time by following the unsubscribe instructions included in such communications or by contacting us using the information provided in Section 14.

## **11.5 Cookie Preferences**

You may manage your cookie preferences through your browser settings as described in Section 6.3 of this Policy.

## **11.6 Rights Regarding PHI**

**Rights regarding Protected Health Information are governed by HIPAA and the applicable Business Associate Agreement.** Trinity Connection does not maintain a direct relationship with the individuals whose PHI we process. Individuals seeking to exercise rights regarding their PHI — including the right to access, amend, or receive an accounting of disclosures — should contact their healthcare provider or the law firm that provided the records to Trinity Connection.

## **11.7 California Residents**

If you are a California resident, you may have additional rights under the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("**CCPA/CPRA**"), including the right to know what personal information we collect, the right to delete personal information, and the

right to opt out of the sale or sharing of personal information. As noted in this Policy, Trinity Connection does not sell personal information. To exercise your rights under California law, please contact us using the information provided in Section 14.

## **11.8 Submitting Rights Requests**

To submit a request to exercise any of the rights described above, please contact us at **privacy@trinityconnection.com** or by mail at the address provided in Section 14. We may require verification of your identity before processing your request. We will respond to verified requests within the timeframe required by applicable law.

## **12. CHILDREN'S PRIVACY**

The Website and our services are not directed to individuals under the age of eighteen (18). We do not knowingly collect personal information from minors. If we become aware that we have inadvertently collected personal information from an individual under the age of eighteen, we will take reasonable steps to delete such information promptly. If you believe that we may have collected information from a minor, please contact us immediately using the information provided in Section 14.

## **13. CHANGES TO THIS PRIVACY POLICY**

Trinity Connection reserves the right to update, modify, or amend this Privacy Policy at any time at our sole discretion. When we make material changes to this Policy, we will post the revised version on the Website and update the "Last Updated" date at the top of the document.

We encourage you to review this Policy periodically to stay informed about our privacy practices. Your continued use of the Website or our services

following the posting of a revised Privacy Policy constitutes your acknowledgment and acceptance of the changes.

For material changes that significantly affect how we handle PHI, we will provide notice to affected client law firms in accordance with the terms of the applicable Business Associate Agreement.

## 14. CONTACT INFORMATION

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us:

**Trinity Connection**

**Attention:** Privacy Inquiries

**Email:** [contact@triconnection.org](mailto:contact@triconnection.org)

**Mailing Address:**

Trinity Connection

*(Full street address to be provided upon request)*

We will endeavor to respond to all inquiries within a reasonable timeframe. For urgent matters relating to a potential data breach or security incident involving PHI, please indicate the urgency of your communication in the subject line of your email.

## 15. DISCLAIMER

This Privacy Policy is provided for informational purposes only and does not constitute legal advice. Trinity Connection is not a law firm, does not provide legal services, and does not render legal opinions.

Users of the Website and clients of Trinity Connection are encouraged to consult with their own qualified legal counsel regarding privacy, data protection, and HIPAA compliance matters as they relate to their specific circumstances.

This Policy does not create an attorney-client relationship, a fiduciary relationship, or any other professional relationship between Trinity Connection and any visitor, user, or reader of this document, except as may be expressly established by a separate written agreement.

The information contained in this Policy is subject to change and may not reflect the most current legal developments. Trinity Connection makes no representations or warranties, express or implied, regarding the completeness, accuracy, or applicability of this Policy to any particular situation.

— End of Privacy Policy —

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