

### What should I consider before allowing a third-party app to access my health care data?

You should always protect your health care data, and knowing what to look for can help you make better decisions.

The first thing you should look for is an easy-to-read privacy policy. A privacy policy should tell you how the third-party app will use your data and personal information. If an app does not have a privacy policy, you **should not use it**.

Things to think about when you are considering using a third-party app include the following.

- What data will be shared on the app? Will the app share non-health data?
- Will your data be stored in the app?
  - How will the app use your data?
  - Will the app share your data with anyone else?
- Will the app sell your data for advertising or research?
- Will the app share your data for any reason?
- Can you limit the app's use of your data?
- Does the app use security measures to protect your data?
- Is there an impact on anyone else if you share your data in the app?
- How can you access your data and make corrections in the app?
- Does the app have a way to receive and respond to complaints?
- How do you stop the app from having your data if you do not want to use the app anymore?
  - What is the app's policy for deleting your data? Do you have to do more than just delete the app from your device?
- How does the app tell users if it changes the rules?

The app's privacy policy should answer these questions. If they do not answer these questions, then you should not use the app. You should choose an app with strong privacy standards that protects your data.

Third-party apps are asked to confirm certain privacy policies. If the third-party app responds negatively or does not respond at all, a warning will show when you open the app. After you read the warning, you can change your mind about sharing your data with the app. If you choose to download the app after the warning, your data will be shared.

Remember, it is very important to read the privacy policy of the app before you use it.

## What if I'm part of an enrollment group?

Some members share a health care policy with other family members in their household. Sometimes members can access information for other members covered under that health care policy. You will only be able to access your own data through the app.

## What are my rights under the Health Insurance Portability and Accountability Act (HIPAA)? Who must follow HIPAA?

You can learn more about HIPAA at [hhs.gov/hipaa/for-individuals/guidance-materials-for-consumers/index.html](https://hhs.gov/hipaa/for-individuals/guidance-materials-for-consumers/index.html).

You can find more information on the **HIPAA FAQs for Individuals** at [hhs.gov/hipaa/for-individuals/faq/index.html](https://hhs.gov/hipaa/for-individuals/faq/index.html).

## Are third-party apps covered by HIPAA?

Most third-party apps are not covered by HIPAA. Most third-party apps are covered under the Federal Trade Commission (FTC) and the FTC Act. The FTC Act protects against false acts. The FTC provides information about mobile app privacy and security here at [consumer.ftc.gov/articles/0018-understanding-mobile-apps](https://consumer.ftc.gov/articles/0018-understanding-mobile-apps).

## What should I do if I think my information has been leaked or the app used my data inappropriately?

You can file a complaint by contacting Network Health's Privacy Manager at **800-826-0940** (TTY 800-947-3529). Complaints may also be made in writing to the address below.

Network Health  
Attn: Compliance  
1570 Midway Pl.  
Menasha, WI 54952

You can also submit a complaint to U.S. Department of Health and Human Services (HHS) Office for Civil Rights (OCR) or FTC.

- File a complaint with OCR under HIPAA at [hhs.gov/hipaa/filing-a-complaint/index.html](https://hhs.gov/hipaa/filing-a-complaint/index.html).
- File a complaint with OCR using the OCR complaint portal at [ocrportal.hhs.gov/ocr/smartscreen/main.jsf](https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf).
- File a complaint with the FTC by visiting [reportfraud.ftc.gov](https://reportfraud.ftc.gov).