
NOTICE OF PRIVACY PRACTICES

Effective Date: September 19, 2026 | P&G Clinical Services, PLLC ("P&G")

THIS NOTICE DESCRIBES HOW YOUR HEALTH INFORMATION MAY BE USED AND DISCLOSED AND HOW YOU CAN ACCESS IT. PLEASE REVIEW IT CAREFULLY.

P&G provides mental health services to patients in North Carolina and South Carolina. This Notice applies to protected health information (PHI) created or maintained by P&G in connection with telehealth, in-person services when offered, electronic health records, billing, and practice communications. More protective federal or state confidentiality requirements apply when they govern particular information or disclosures.

Our Responsibilities

- Maintain the privacy and security of PHI; provide this Notice; and follow the Notice currently in effect.
- Notify affected individuals following a breach of unsecured PHI as required by law.
- Follow applicable North Carolina and South Carolina confidentiality laws and additional protections for qualifying substance use disorder (SUD) records under 42 C.F.R. Part 2.

We reserve the right to change this Notice and apply the revised terms to all PHI we maintain. A revised Notice will be available upon request and prominently posted on our website, if we maintain a website describing our services, and at our physical service location when applicable. We will provide the revised Notice as required by law.

How We May Use and Disclose Information Without Written Authorization

HIPAA permits certain uses and disclosures without written authorization. We make them only when applicable federal and state law allows; a stricter confidentiality rule or a restriction we have agreed to may require your consent or limit disclosure.

1. Treatment

We may use and disclose information to provide, coordinate, or manage care, including consultation among treating providers, referrals, care coordination, and emergency treatment. HIPAA's minimum-necessary standard generally does not apply to disclosures to or requests by healthcare providers for treatment; other applicable confidentiality limits still apply.

2. Payment

We may use or disclose information to verify benefits and eligibility; seek prior authorization; submit and correct claims; collect payment; coordinate primary and secondary insurance; and respond to insurer, Medicaid, Medicare, TRICARE, managed-care organization, or other payer reviews and audits. We limit disclosures to information reasonably necessary for the purpose, subject to applicable legal requirements and your rights described below.

3. Healthcare Operations

We may use or disclose information for quality improvement, treatment review, supervision, credentialing, staff training, licensing, compliance, audits, risk management, legal and administrative services, and other permitted healthcare operations. Staff and contractors receive access based on their authorized duties. Business associates handling PHI for P&G are subject to applicable HIPAA safeguards and agreements.

4. Uses or Disclosures Required or Permitted by Law

When permitted or required by applicable law, we may disclose limited information for:

- Reporting suspected abuse, neglect, or exploitation of children or vulnerable adults;
- Preventing or reducing a serious and imminent threat to health or safety;
- Public health reporting and legally authorized health oversight, licensing, or investigations;

- Lawful judicial or administrative proceedings, subpoenas, court orders, and certain law-enforcement requests, after reviewing applicable confidentiality and privilege protections;
- Workers' compensation, coroners or medical examiners, correctional settings, and specialized government functions, when authorized;
- Research only under an applicable authorization, waiver, or other lawful safeguards.

A subpoena alone does not automatically authorize disclosure of every counseling record. We review requests for compliance with HIPAA, applicable state law, privilege, and any additional Part 2 protections before releasing information.

Additional Confidentiality Protections for Mental Health Records

North Carolina law, including N.C. Gen. Stat. §§ 122C-52 through 122C-56 when applicable, and South Carolina laws governing confidential mental health records and privileged communications may restrict disclosures that HIPAA would otherwise permit. We obtain the patient's or authorized representative's written consent when required, including for disclosures to outside contacts, and disclose without it only when an applicable legal exception permits or requires disclosure. We verify the identity and authority of a person requesting information.

Substance Use Disorder Records — 42 C.F.R. Part 2

Some SUD diagnosis, treatment, or referral records are protected by 42 C.F.R. Part 2. Not every record mentioning substance use is automatically a Part 2 record. Where Part 2 applies, P&G follows its additional confidentiality rules.

- We obtain Part 2-compliant written consent when required. A qualifying single consent may authorize future uses and disclosures for treatment, payment, and healthcare operations. Consent may be revoked in writing except to the extent action has already been taken in reliance on it.
- Part 2 records disclosed with a valid consent for treatment, payment, or healthcare operations to a HIPAA-covered recipient may be redisclosed as HIPAA permits, subject to Part 2 restrictions on use in proceedings against the patient. Other recipients may be subject to additional redisclosure limits.
- Part 2 records or testimony may not be used or disclosed in civil, criminal, administrative, or legislative proceedings against the patient without the patient's specific written consent or a qualifying Part 2 court order accompanied by a subpoena or similar legal mandate, as required.
- Where applicable, we honor additional Part 2 restrictions, notice, complaint, and breach requirements. Certain Part 2 accounting requirements will apply when their compliance date becomes effective.

Uses and Disclosures Requiring Written Authorization

Except where a legal exception applies, we obtain written authorization for uses or disclosures not otherwise described or permitted by this Notice, most marketing uses, and sale of PHI. You may revoke an authorization in writing; revocation does not undo disclosures already made in reliance on it.

Psychotherapy Notes

Psychotherapy notes, as HIPAA defines them, are a mental health professional's separately maintained notes documenting or analyzing the contents of a counseling session; ordinary progress notes and treatment records are not psychotherapy notes merely because they relate to therapy. Written authorization is generally required to use or disclose psychotherapy notes, subject to HIPAA's limited exceptions, including use by the originator for treatment; qualifying training; defense of a legal action brought by the patient; disclosures required by law; specified oversight; preventing serious threats; and HHS compliance investigations.

SUD Counseling Notes

If we maintain separately protected SUD counseling notes under Part 2, their use or disclosure generally requires specific consent separate from consent for other Part 2 records, except where the law permits otherwise.

Situations Where You May Agree or Object

When applicable law permits, we may share information relevant to your care or payment with family, friends, or another person involved in your care if you agree, have an opportunity to object and do not object, or the law otherwise permits. In an emergency or if you are unavailable, we may share limited information in your best interest when lawful. We may share limited information with disaster-relief organizations when authorized. Additional state or Part 2 consent requirements still control.

If P&G conducts fundraising using PHI as permitted by law, you may opt out of further fundraising communications. Part 2-protected information will not be used for fundraising without the required consent and a clear opportunity to opt out.

How We May Contact You

We may contact you by phone, voicemail, text, email, mail, fax, or patient portal regarding appointments, treatment, referrals, benefits, insurance, billing, forms, and practice operations. Electronic communications and voicemail can carry privacy risks. You may request reasonable confidential communication methods or locations. Do not use routine practice messages for emergencies.

Your Rights Regarding Your Health Information

Receive This Notice and Choose a Representative

You may request a paper copy of this Notice even if you receive it electronically. A person legally authorized to act for you may exercise applicable rights after we verify their authority.

Request Confidential Communications

You may ask us to contact you in a specific way or at a specific location. We will accommodate reasonable requests.

Inspect and Obtain Copies

You may request access to or a paper or electronic copy of information in your designated record set, subject to limited legal exceptions, including separately maintained psychotherapy notes and qualifying SUD counseling notes. We generally respond within 30 days under HIPAA; a lawful extension may apply with written notice. We may charge only fees permitted by applicable law.

Request an Amendment

You may request a correction to information you believe is inaccurate or incomplete. If we deny the request, we will explain the reason in writing and describe available rights to disagree.

Request an Accounting of Disclosures

You may request an accounting of certain disclosures during the six years before your request. HIPAA excludes some disclosures, including many for treatment, payment, and healthcare operations. We provide one accounting in a 12-month period without charge and may charge a reasonable cost-based fee for additional accountings after advance notice. Additional accounting rights for Part 2 records apply when legally effective.

Request Restrictions

You may request restrictions on uses or disclosures for treatment, payment, or healthcare operations. We are generally not required to agree. However, if you pay out of pocket in full for a healthcare item or service and request that we not disclose information about that item or service to your health plan for payment or healthcare operations, we must honor that qualifying request unless disclosure is required by law. Tell us before claims or disclosures are submitted so we can process the request.

File a Complaint Without Retaliation

You may complain to P&G or the U.S. Department of Health and Human Services, Office for Civil Rights (OCR), if you believe your privacy rights have been violated. We will not retaliate against you for filing a complaint.

Minors and Personal Representatives

The ability of a parent, guardian, or other personal representative to access or authorize release of a minor's information depends on applicable North Carolina or South Carolina law, the nature of the services, legal authority, and any confidentiality exception. We evaluate each request rather than assuming that every parent or guardian may access all records. We also respect valid court orders and applicable protections for minors who may consent to certain services themselves.

Additional Rights in Mental Health Services

Consistent with applicable law and P&G's patient-rights policies, patients have rights to dignity, respect, privacy, individualized care, participation in treatment planning, freedom from abuse or exploitation, and access to appropriate complaint processes. Treatment consent and refusal are subject to applicable emergency and other legal exceptions.

Social Media, Recording, and Online Contact

P&G providers do not accept personal social-media friend requests from current or former patients. Please do not send clinical, billing, scheduling, or emergency information through social-media accounts. Recording, photographing, or taking screenshots of sessions requires advance written authorization from P&G and all participants whose consent is required by law. Unauthorized recording may affect the provision of services and may have legal consequences.

Record Retention and Access

P&G retains adult patient records for at least 11 years after the last date of service. For patients treated as minors, P&G retains records for at least 12 years after the patient turns 18 AND at least 13 years after the last date of treatment, whichever is later. We retain records longer when required by a payer agreement, Medicaid or other program rule, licensing or professional obligation, audit, investigation, litigation hold, or other applicable law. These periods are P&G retention commitments and may exceed some legal minimums. Records are stored and disposed of securely.

Medicaid and other payer documentation is maintained and made available for authorized audits and reviews as required by the applicable program, contract, and law. Requests for records are processed under the applicable access and confidentiality rules.

Reproductive Health Information

We protect reproductive health information under applicable HIPAA and state confidentiality requirements. Requests for such information are reviewed to determine whether a use or disclosure is permitted or required by law.

Questions and Complaints

Privacy Officer: Clinical Director, P&G Clinical Services, PLLC

Phone: (704) 408-8489 | Email: info@pgclinicalservices.com

You may also file a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights: 200 Independence Avenue SW, Washington, DC 20201; (877) 696-6775; www.hhs.gov/hipaa/filing-a-complaint/. No retaliation will occur for filing a complaint.