



Encircle Therapy

HIPAA Notice of Privacy Practices

Effective Date: August 12, 2026

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Encircle Therapy (“Encircle,” “we,” “us,” or “our”) is committed to protecting the privacy of your health information. This Notice of Privacy Practices (“Notice”) explains how Encircle may use and disclose your protected health information (“PHI”), your rights regarding your PHI, and our responsibilities under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and other applicable law.

This Notice applies to Encircle Therapy’s healthcare services, including services provided in person and through telehealth.

This Notice applies to PHI that Encircle creates, receives, maintains, or transmits in connection with providing healthcare services to you.

This Notice does not replace Encircle’s general website Privacy Policy. Our website Privacy Policy describes information practices relating to our website, applications, cookies, analytics, advertising, device information, and other information that may not constitute PHI under HIPAA.

Our Responsibilities

Encircle is required by law to:

- Maintain the privacy of your PHI.
- Provide you with this Notice describing our legal duties and privacy practices with respect to your PHI.

- Follow the terms of the Notice currently in effect.
- Use and disclose your PHI only as permitted or required by applicable law.
- Notify you as required by law if a breach occurs involving your unsecured PHI.
- Obtain your written authorization for uses and disclosures of your PHI when an authorization is required by law.

Encircle reserves the right to change this Notice. If we make a material change to our privacy practices or this Notice, we will make the revised Notice available as required by law, including by posting the current Notice on our website.

How We May Use and Disclose Your PHI

The following sections describe the principal circumstances in which Encircle may use or disclose your PHI without obtaining your written authorization.

Treatment

We may use and disclose your PHI to provide, coordinate, or manage your healthcare and related services.

For example, your Encircle therapist may use information about your mental health, treatment history, medications, or other relevant health information when providing therapy to you. We may also disclose relevant information to another healthcare provider involved in your care when permitted by law.

Payment

We may use and disclose your PHI to obtain payment for healthcare services we provide or to determine eligibility or coverage for those services.

Because Encircle accepts insurance, this may include providing information to your health plan or other payer for purposes such as:

- Determining eligibility or coverage;
- Obtaining payment for services;
- Submitting and processing claims;
- Obtaining prior authorization;
- Determining medical necessity;
- Reviewing claims; and
- Responding to payment-related inquiries or disputes.

We may also disclose information to other parties involved in payment for your healthcare when permitted by law.

Healthcare Operations

We may use and disclose your PHI for healthcare operations, which are activities necessary to operate our practice and maintain or improve the quality and efficiency of our healthcare services.

Examples include:

- Quality assessment and improvement;
- Reviewing the performance of healthcare professionals;
- Training and education;
- Credentialing and compliance activities;
- Auditing;
- Risk management;
- Business planning;
- Case management and care coordination;
- Fraud and abuse detection and prevention;
- Legal and compliance activities; and
- Other healthcare operations permitted by HIPAA.

Business Associates

Encircle may use third-party companies and individuals to perform services on our behalf that involve the use or disclosure of PHI. These parties are known as “business associates.”

Examples may include vendors that support healthcare operations, billing, information technology, electronic health records, telehealth, scheduling, or other services.

Encircle requires its business associates to appropriately safeguard PHI as required by applicable law and, where required, through written agreements.

Persons Involved in Your Care or Payment

When permitted by law, we may disclose relevant PHI to a family member, close personal friend, or another person you identify who is involved in your healthcare or payment for your healthcare.

We may also use or disclose information to notify or assist in notifying such persons about your location, general condition, or death when permitted by law.

You may ask us not to make these disclosures, subject to applicable law.

Required or Permitted by Law

We may use or disclose your PHI when required or permitted by federal, state, or local law.

Depending on the circumstances, permitted or required disclosures may include disclosures:

- To public health authorities for legally authorized public health activities;
- To report certain types of abuse, neglect, or domestic violence when required or permitted by law;
- To health oversight agencies for activities authorized by law;
- In response to a court order, administrative proceeding, subpoena, discovery request, or other lawful process when permitted by law;
- To law enforcement when permitted or required by law;
- To coroners and medical examiners;
- For organ, eye, or tissue donation and transplantation purposes;
- For certain research activities;
- To prevent or lessen a serious and imminent threat to health or safety when permitted by law;
- For workers' compensation purposes when permitted by law;
- For certain specialized government functions; and
- For other purposes authorized or required by applicable law.

We will apply the HIPAA minimum-necessary standard when it applies to a particular use or disclosure.

Uses and Disclosures That Require Your Written Authorization

Some uses and disclosures of PHI require your written authorization.

Except as otherwise permitted or required by law, Encircle will obtain your written authorization before using or disclosing your PHI for purposes that require authorization under HIPAA.

Examples include:

Psychotherapy Notes

Most uses and disclosures of psychotherapy notes maintained separately from the medical record require your written authorization, except where HIPAA permits otherwise.

Marketing

Uses and disclosures of PHI for marketing generally require your written authorization when required by HIPAA.

Sale of PHI

A disclosure of PHI that constitutes a sale of PHI generally requires your written authorization.

Other Uses and Disclosures

Any other use or disclosure of your PHI not described in this Notice or otherwise permitted or required by law will generally require your written authorization.

You may revoke a written authorization in writing at any time, except to the extent Encircle has already relied upon the authorization or as otherwise provided by law.

Your Rights Regarding Your PHI

You have the following rights regarding your PHI. Certain limitations and exceptions apply under federal and Utah law.

Right to Inspect and Obtain a Copy of Your PHI

You generally have the right to inspect and obtain a copy of PHI that Encircle maintains about you in a designated record set.

You may request your records in an electronic or paper format, subject to applicable law.

We may charge a reasonable, cost-based fee when permitted by law.

To request access to your records, contact:

Encircle Privacy Officer

Malia Burgess, MSW, MFA, LCSW

358 South 700 East, B430
Salt Lake City, Utah 84102

info@encircletherapy.org
(801) 613-7198

In certain circumstances permitted by law, Encircle may deny access to some or all of your PHI. If we deny your request, we will provide you with a written explanation and, when applicable, information about your right to have the denial reviewed.

Right to Request an Amendment

You generally have the right to request that Encircle amend PHI that you believe is incorrect or incomplete.

Requests must be made in writing and should explain why you believe the information should be amended.

We may deny a request for amendment in circumstances permitted by law. If we deny your request, we will provide a written explanation and information about your rights regarding the denial.

Right to Request Restrictions

You generally have the right to request a restriction or limitation on how Encircle uses or discloses your PHI for treatment, payment, or healthcare operations.

Encircle is not required to agree to every requested restriction.

However, if you or another person on your behalf pays for a healthcare service or item entirely out of pocket and you request that we not disclose information about that service or item to your health plan for payment or healthcare operations purposes, Encircle will generally agree to the restriction unless disclosure is otherwise required by law.

Right to Request Confidential Communications

You have the right to request that Encircle communicate with you about your healthcare by a particular means or at a particular location.

For example, you may request that we contact you:

- At a particular telephone number;
- At a particular email address;
- At a particular mailing address; or
- Through another reasonable communication method.

You do not have to explain why you are making the request.

Encircle will accommodate reasonable requests as required by applicable law.

Right to an Accounting of Disclosures

You generally have the right to request an accounting of certain disclosures of your PHI made by Encircle during the six years before the date of your request, subject to limitations and exceptions under applicable law.

An accounting generally does not include disclosures such as those made for treatment, payment, or healthcare operations, disclosures made pursuant to your authorization, or other disclosures excluded by law.

Right to Receive a Copy of This Notice

You have the right to receive a paper copy of this Notice at any time.

You may request a paper copy by contacting the Encircle Privacy Officer. You may also view or download the current Notice from our website.

<https://encircletogether.org/hipaa-npp>

Telehealth and Electronic Communications

Encircle provides healthcare services through telehealth and other electronic communications.

When you receive services through telehealth, Encircle will use and disclose your PHI in accordance with applicable HIPAA requirements and other applicable law.

Telehealth may involve electronic technologies and service providers that transmit or store health information. Encircle uses appropriate safeguards and, where required, contracts with vendors as business associates to protect PHI.

Electronic communications may also include ordinary communications such as appointment reminders, scheduling messages, or other communications related to your care. You may request confidential communications or alternative communication methods as described in this Notice.

You should understand that no electronic communication method can be guaranteed to be completely free from security risks. Encircle will maintain safeguards required by applicable law to protect your PHI.

Confidential and Alternative Communications

You may request that Encircle communicate with you about your healthcare in an alternative way or at an alternative location if you believe that communication through our usual methods could put you at risk.

For example, you may ask Encircle to contact you only through a particular phone number, email address, or mailing address.

To request confidential or alternative communications, contact:

Encircle Privacy Officer

Malia Burgess, MSW, MFA, LCSW

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Specially Protected Health Information

Certain types of health information may receive additional protections under federal or Utah law.

Depending on the circumstances, these protections may apply to information concerning mental health services, substance use disorder treatment, HIV/AIDS, reproductive health, or other specially protected information.

Encircle will comply with applicable federal and Utah privacy requirements governing specially protected health information.

If Encircle maintains records subject to additional federal confidentiality requirements, including applicable requirements governing substance use disorder records, those requirements will be followed where applicable.

Nothing in this Notice is intended to authorize a use or disclosure of PHI that is prohibited by applicable law.

Your Rights Regarding Reproductive Health Information

Encircle will comply with applicable federal and Utah requirements governing the privacy and disclosure of reproductive health information.

Where applicable law requires additional restrictions, attestations, or other protections for certain uses or disclosures of PHI relating to reproductive healthcare, Encircle will follow those requirements.

Nothing in this Notice authorizes Encircle to use or disclose PHI in a manner prohibited by applicable law.

Complaints About Your Privacy Rights

If you believe that your privacy rights have been violated, you may file a complaint with Encircle.

You will not be retaliated against for filing a privacy complaint or for exercising any rights protected by HIPAA.

To file a complaint with Encircle, contact:

Encircle Privacy Officer

Malia Burgess, MSW, MFA, LCSW

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You may also file a complaint with the **U.S. Department of Health and Human Services, Office for Civil Rights (“OCR”)**.

Information about filing an OCR complaint is available at:

<https://www.hhs.gov/ocr/complaints/index.html>

You may file a complaint with OCR without first filing a complaint with Encircle.

Encircle will not retaliate against you for filing a complaint with HHS or for otherwise exercising your privacy rights.

Questions About This Notice

If you have questions about this Notice or your privacy rights, please contact:

Encircle Privacy Officer

Malia Burgess, MSW, MFA, LCSW

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Salt Lake City, Utah 84102
info@encircletherapy.org
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Effective Date and Availability

Effective Date: August 12, 2026

This Notice is effective as of the date stated above.

Encircle reserves the right to change this Notice and make a revised Notice applicable to PHI that Encircle already maintains, as permitted by law.

The current version of this Notice will be available on Encircle's website and upon request.

THIS NOTICE OF PRIVACY PRACTICES IS AVAILABLE ELECTRONICALLY ON OUR WEBSITE AND IN PAPER FORM UPON REQUEST.

If you have questions about this Notice or your privacy rights, please contact the Encircle Privacy Officer using the contact information provided above.