

[Resources page](#)

[Title: Important Information about Sam the Chatbot, Powered by Google Cloud](#)

[If you use the Chatbot, HealthCo shares data with Google Cloud](#)

[Why HealthCo needs this](#)

[What data will be shared with Google Cloud?](#)

[We need your permission because data stored by Google Cloud is not covered under HIPAA](#)

[HIPAA Auth document](#)

[Main title: Digital HIPAA Authorization](#)

[HIPAA Authorization](#)

## Resources page

### **Title: *Important Information about Sam the Chatbot, Powered by Google Cloud***

***Before you begin using the Chatbot, please review the information below and the legal document on the next page.***

***We're required to notify you that HealthCo is partnering with Google Cloud to deliver interactive chat functionality. We are asking for your consent to collect, use, and disclose your protected health information (PHI) in connection with the Chatbot.***

### **If you use the Chatbot, HealthCo shares data with Google Cloud**

HealthCo is partnering with Google Cloud to deliver interactive chat functionality. We are asking for your consent to collect, use, and disclose your protected health information (PHI) in connection with the Chatbot.

### **Why HealthCo needs this**

We use Google Cloud services to enable our automated Chatbot to understand and answer your questions. We use the information you provide to deliver the Chatbot service and to improve the service over time.

### **What data will be shared with Google Cloud?**

- Anything you type into the Chatbot and all responses provided to you by the Chatbot
- Your protected health information relevant to the questions you ask in the Chatbot, for example, information related to medical conditions, procedures, and your insurance benefits
- Your internet protocol (IP) address, browser type, date/time stamp, referring/exit pages, and information about your clicks in the Chatbot

### **We need your permission because data stored by Google Cloud is not covered under HIPAA**

Information exchanged during the chat may be stored by Google Cloud in its cloud platform. Google Cloud is not subject to the same information management laws and regulations as HealthCo. When your data is transferred to Google Cloud, it is no longer covered under HIPAA. However, precautions are still taken to ensure the security and privacy of your data. Data is transmitted securely to Google Cloud, and they store data securely in their US-based cloud data centers. Google Cloud employees are not permitted to access your data without our explicit permission. Google cannot sell your health information or use it to target ads.

For more information about how Google commits to protecting your data, visit [Google Cloud Enterprise Privacy Commitments](#).

# HIPAA Auth document

## Main title: Digital HIPAA Authorization

### **Our digital program allows us to provide customized tools for you**

HealthCo is partnering with Google to create a remarkable digital member experience. Our goal is to enhance your health-related journey, make your experience on our digital tools and channels more customized and applicable to your specific needs, and give you more convenient access to information about your healthcare plan. This collaborative effort (the “Program”) involves HealthCo gathering, utilizing, and sharing appropriate customer information with Google to help design, implement, and manage innovative capabilities that enable our members to quickly access up-to-date plan information and other details through a cloud-hosted digital member website, mobile app, and an integrated conversational chatbot tool. The Chatbot allows users to ask questions on our member portal—for example, “Have I met my deductible this year?”—and to receive answers quickly and conveniently.

### **We collect information to offer a personalized experience**

To offer a personalized experience, HealthCo already collects, uses, and discloses personal information across our digital tools and channels. This information can include, among other things, demographics such as your name and date of birth, contact information such as phone number, address, and email address, details about receipt of healthcare services such as dates of service and medical conditions and procedures, details about your insurance benefits such as policy number and claims, and information about your activities on our digital tools and channels such as internet protocol (IP) address, device identifier, and cookie ID (collectively, “Personal Information”).

### **We may share information to deliver and improve our digital services**

If you agree to these terms and continue to use the HealthCo Chatbot, the information we collect may be transferred to Google Cloud. This information would be used to deliver the Chatbot and other program services as well as to improve them over time.

### **We take steps to reduce the risks of data sharing**

HealthCo recognizes that Google Cloud is not subject to HIPAA, and it also may not be subject to the same range of other federal and/or state laws governing the collection, use, and disclosure of Personal Health Information (PHI). Nevertheless, we have taken a number of steps to ensure that your information is handled responsibly. This includes technical provisions such as ensuring that your data is encrypted when it is being transmitted between our systems and our partners’ systems, and that your data is encrypted at rest while stored in our partners’ data centers. Google Cloud personnel are not permitted to access your data without our explicit permission. Google Cloud will not sell your PHI or use it for advertising.

### **HIPAA requires us to request your permission to disclose your data**

As an entity subject to the Health Insurance Portability and Accountability Act (HIPAA), HealthCo must meet standards set by federal regulations regarding the collection, use, and disclosure of Personal Information relating to your healthcare and payment for your care (“Protected Health Information” or “PHI”). The law requires that we ask you to sign below before collecting, using, and disclosing your PHI to Google Cloud in connection with the Program.

## **HIPAA Authorization**

I understand that HealthCo must collect, use, and disclose my Personal Information and Personal Health Information (PHI) to Google Cloud in order to deliver this Program and provide the Chatbot. I understand that Google Cloud is not subject to HIPAA or certain other healthcare information laws that HealthCo must follow.

I understand that the PHI that could be disclosed includes, but is not limited to, the following:

- information maintained in my health plan’s member portal such as policy number, co-pay, co-insurance, and deductible information, dates of service, and claims information
- any information I type into the Chatbot interface

I am aware that my PHI might include certain sensitive medical information regarding HIV, behavioral health, or drug and alcohol conditions, if such information is contained in my member portal or if I type such information into the Chatbot interface.

Accordingly, I authorize HealthCo as follows:

I authorize HealthCo to disclose my PHI to Google Cloud for purposes of supporting the Program. This Authorization will remain in effect until I revoke it by notifying HealthCo as specified below.

I acknowledge that Google Cloud is not subject to HIPAA or certain other federal and/or state privacy and security laws and regulations in the same manner, or to the same degree, as HealthCo. I understand that I will not have the right to access or amend the information about me that is stored with Google Cloud.

I understand the risks to my information by participating in this Program and I hereby authorize the collection, use, and disclosure of my PHI.

I acknowledge that under certain laws or regulations, HealthCo’s disclosure of my information could be deemed a “sale” of information. I authorize HealthCo’s disclosure of my information in connection with Program activities even if such disclosure constitutes a “sale” under applicable law.

This Authorization will remain in effect until I revoke it. I understand that I may revoke this Authorization at any time via the Data Sharing section in the Chatbot's Options menu, or by sending an email to [HealthCoITSupport@HealthCo.com](mailto:HealthCoITSupport@HealthCo.com) indicating my intent to revoke. I understand that my revocation will not apply to any information that was sent to Google Cloud before I revoked my authorization.

I understand that I am not required to provide my authorization in order to receive healthcare services or insurance benefits. I also acknowledge that I am entitled to a copy of this Authorization upon request.

If I choose to revoke this Authorization, I understand that I will no longer be able to use the HealthCo Chatbot and will no longer receive other benefits associated with this specific Program. I understand that I will still be able to use the HealthCo website but that my experience may not be customized in certain ways that are possible when participating in the Program and using the Chatbot.