

HIPAA Compliance Notice

Effective Date: November 14, 2025

Company: SmileSafe AI LLC (“**SmileSafe AI**,” “**we**,” “**us**,” or “**our**”)

Address: 1401 Hesters Crossing Road, Round Rock, TX 78681, USA

Contact for Privacy/HIPAA Matters: info@smilesafeai.com

This HIPAA Compliance Notice describes how SmileSafe AI supports protection of **Protected Health Information (PHI)** when our Services are used by covered entities (e.g., schools with clinics, healthcare providers) and their business associates. It should be read together with our **Privacy Policy**, **Data & Consent Policy**, and any executed **Business Associate Agreement (BAA)**.

Our role: For deployments involving PHI, SmileSafe AI typically acts as a **Business Associate** to a covered entity and processes PHI only as permitted by a signed BAA and applicable law.

1) Permitted Uses & Disclosures

When acting as a Business Associate, we use/disclose PHI **solely** to:

- Provide, maintain, and support our Services (e.g., scanning/screening workflows, reports, referrals).
- Perform proper management and administration or meet legal obligations, as allowed by HIPAA.
- De-identify PHI for analytics and service improvement, consistent with 45 CFR §164.514 (no individual identification).

We do **not** use PHI for marketing or sell PHI.

2) Minimum Necessary

We implement controls and procedures to ensure workforce members and subprocessors access **only the minimum necessary** PHI to perform their job functions.

3) Administrative, Technical & Physical Safeguards

We maintain safeguards reasonably designed to protect the confidentiality, integrity, and availability of ePHI, including:

- **Administrative:** policies, workforce training and confidentiality, access approvals, vendor due diligence, risk assessments.
- **Technical:** role-based access, MFA support, encryption in transit, network isolation, logging/monitoring, vulnerability management, backups.
- **Physical:** data center controls via reputable hosting providers; device security standards for any support hardware.

4) Subprocessors

We may engage vetted subprocessors to support hosting, storage, messaging, translation, and security. Each subprocessor is bound by written obligations consistent with HIPAA and the BAA, including safeguards and limits on PHI use.

5) Breach Notification

If we discover a **breach of unsecured PHI** or a security incident affecting PHI, we will **notify the covered entity without undue delay**, supply the information required by 45 CFR §164.410, and cooperate on mitigation and any required notices.

6) Access, Amendment, and Accounting

We support covered entities in fulfilling individuals' HIPAA rights, including:

- Access to designated record sets;
- Amendments to PHI; and

- Accounting of certain disclosures, as described in 45 CFR §§164.524–164.528 and the BAA.

Requests should be directed to the covered entity; we act upon their documented instructions.

7) Return or Destruction of PHI

Upon termination or expiration of the Services/BAA, and at the covered entity's written direction, we will **return or destroy PHI** that we maintain, if feasible. If destruction is infeasible, we will continue to protect PHI and limit uses/disclosures to those purposes that make return/destruction infeasible.

8) Documentation & Audits

We maintain documentation of HIPAA-related policies, workforce training, and risk management activities. Upon reasonable written request from a covered entity (or as required by law), we will provide relevant documentation and cooperate with audits consistent with the BAA.

9) Organizational Policies & Training

Our workforce members with potential PHI access receive **privacy and security training** appropriate to their roles and are subject to confidentiality obligations and disciplinary measures for violations.

10) Changes to this Notice

We may update this Notice to reflect changes in law or our practices. Material updates will be communicated to administrative contacts for active customers and posted on our website with a new effective date.

Contact

Questions about this HIPAA Compliance Notice, our safeguards, or to request a copy of our standard BAA:

SmileSafe AI LLC

1401 Hesters Crossing Road, Round Rock, TX 78681, USA

Email: info@smilesafeai.com