LEGAL

Consumer Health Data Privacy Policy

Clear to Send · https://cleartosend.ai/consumer-health-data

Version 1.0 · Effective October 28, 2026

1. About this policy

This Consumer Health Data Privacy Policy explains how Epiphany AI LLC, doing business as Clear to Send ("Clear to Send," "we," "us"), collects, uses and shares consumer health data, and how you can exercise your rights, under the Washington My Health My Data Act (RCW 19.373). It applies to consumer health data of Washington consumers collected through https://cleartosend.ai and our applications (the "Service").

In Personal & Family vaults, we decide how consumer health data is handled. In business, mortgage, real estate and insurance workspaces, we process consumer health data on behalf of the business that owns the workspace, and that business is responsible for responding to your requests (see Section 7).

2. Consumer health data we collect and why

Categories we collect:

- health-related documents you upload, such as medical records, test results, prescriptions, vaccination and immunization records, disability and accommodation records, and health insurance cards, explanations of benefits and claims;
- information you enter about those documents, such as names, labels, the life folder they are stored in (including the medical folder), the household member they are for, and expiration dates; and
- health information contained in other documents you upload or request, such as insurance applications or loan files.

Purposes and how we use it: we collect and use consumer health data only to provide the Service you requested, which means to store, organize and display your documents; send you reminders before documents expire; share documents with the people you choose; give your household partner login and trusted contacts the access you set up; let you download your documents; secure the Service, maintain audit records and prevent unauthorized access; and comply with law. We do not use consumer health data for advertising, we do not sell it, and we do not use it to train artificial intelligence models.

3. Sources of consumer health data

- directly from you, when you upload or enter it;
- from the household partner login you invite to your Personal & Family vault;
- from a business that uses Clear to Send to request documents from you, such as your insurance agent or mortgage broker; and
- from people who share a package of documents with you.

4. Consumer health data we share

We share the categories of consumer health data listed in Section 2 only as needed to provide the Service you requested or as you direct.

5. Third parties and affiliates we share with

- **Processors that run the Service for us**, under contracts that limit their use of the data: cloud hosting, file storage and backup providers, and email delivery providers that send expiration reminders and notices.
- **People you choose**: recipients of packages you share, your household partner login, and trusted contacts you name for emergency access under the waiting period and access rules you set.
- **Businesses you work with**: the business that owns a workspace you upload documents to, and the people that business shares them with.
- **Government authorities or other parties** when required by law, such as in response to a valid court order.

We do not share consumer health data with any affiliates.

6. Consent

We collect and share consumer health data only to the extent necessary to provide the Service you requested. If we ever want to collect or share consumer health data for any other purpose, we will first ask for your consent, separately for collection and for sharing, and tell you how to withdraw it. Naming a trusted contact, inviting a household partner or sharing a package is your direction to share the documents involved, and you can end that access at any time. We do not sell consumer health data, and we do not use geofencing around health care facilities.

7. Your rights and how to exercise them

Under the My Health My Data Act, you have the right to:

- confirm whether we are collecting, sharing or selling your consumer health data;
- access your consumer health data, including a list of all third parties and affiliates with whom we have shared or sold it and an email address or other online way to contact them;
- withdraw your consent to our collection and sharing of your consumer health data; and
- have your consumer health data deleted.

How to make a request: contact us by phone at 515-462-0124 or by mail at Epiphany AI LLC (dba Clear to Send), Attn: Consumer Health Data Requests, 19692 Fish Ln, Spearfish, SD 57783. Vault owners can also view, download and delete documents at any time in the app. We will verify your identity before acting on a request, usually by confirming control of your account email. If you are the parent or guardian of a minor, or are acting for someone with their written authorization, you may make a request for them.

Timing and cost: we will respond within 45 days of receiving your request. If we need more time, we may extend that once by up to 45 more days and will tell you why within the first 45 days. Requests are free of charge up to twice a year.

Deletion: when we delete consumer health data, we delete it from our records and notify the processors and other third parties we shared it with. Copies in backup systems are deleted within six months of verifying your request.

Business workspaces: if your consumer health data is in a business's workspace, send your request to that business. If you send it to us, we will forward it to the business and help it respond. The business may be legally required to keep some records, such as closed insurance policy or loan files, for a set period.

Appeals: if we decline to act on your request, you may appeal by contacting us with the subject "Consumer health data appeal" within a reasonable time after our decision. We will respond in writing within 45 days, explaining any action taken or not taken and why. If we deny your appeal, you may submit a complaint to the Washington State Attorney General at https://www.atg.wa.gov/consumer-protection ("File a consumer complaint").

8. Contact

Epiphany AI LLC (dba Clear to Send)
Attn: Consumer Health Data Requests
19692 Fish Ln, Spearfish, SD 57783
Phone: 515-462-0124