
HealthRIGHT 360 SMS Privacy Policy

Effective Date: [06/01/2026]

HealthRIGHT 360 (“HR360,” “we,” “us,” or “our”) may use SMS/text messaging to support access to services and care coordination. For the current ECM outreach launch, HR360 text messaging is limited to initial outreach to determine whether a recipient would like more information about Enhanced Care Management (ECM) and related follow-up requested by the recipient. This SMS Privacy Policy explains how we collect, use, disclose, and protect information in connection with our text messaging services.

This SMS Privacy Policy applies only to SMS/text messaging communications used for the current approved texting purpose, unless HR360 later posts an updated policy for additional approved uses. It should be read together with HealthRIGHT 360’s general Notice of Privacy Practices and website privacy materials.

1. Current Approved Use

Before any SMS/text messaging campaign, message template, sender name, short code, phone number, link, landing page, FAQ, HELP response, STOP/opt-out response, follow-up script, recipient population, or response workflow is used, the responsible department must obtain documented Compliance/Privacy approval. Approved materials must be retained with the SMS campaign file.

For the current ECM outreach launch, HR360 may use SMS/text messaging to:

- let you know that HR360 is trying to reach you about a no-cost care support program
- ask whether you would like more information about ECM
- provide HELP and opt-out instructions
- coordinate a follow-up call or other communication if you request more information
- confirm opt-out requests

Additional texting uses, including appointment reminders, care-team communications, treatment-related messaging, billing, fundraising, or marketing, require separate review and approval before use. Text messaging should not be used for emergencies or urgent medical, mental health, or safety concerns. If you are experiencing an emergency, call 911 or go to the nearest emergency room.

Material changes to the scope, purpose, content, recipient population, vendor, sender identification, link, landing page, or response workflow for HR360 text messaging require Compliance/Privacy review and approval before implementation.

2. Information We Collect

When you opt in to receive text messages from us, when we send an outreach message to a number we are authorized to contact, or when you text us, we may collect:

- your mobile phone number
- your name or other identifying information you provide
- message content and any responses you send
- date, time, and delivery information related to messages
- limited device or carrier information made available through our messaging providers

Please do not send detailed medical, behavioral health, substance use, housing, financial, diagnosis-related, or emergency information by text.

3. How We Use Information

We use SMS-related information to:

- conduct current ECM outreach and respond to your request for more information
- document consent or other outreach authority, communications, opt-out requests, and follow-up activity in our records, as appropriate
- support service delivery and communication workflows
- comply with legal, regulatory, and safety obligations

4. Sharing and Disclosure

We may share SMS-related information only as permitted or required by law. When HR360 uses authorized service providers to support text messaging, HR360 requires contractual privacy and security protections and, where applicable, a Business Associate Agreement or other legally required agreement.

We do not sell, rent, or share your mobile number, SMS opt-in data, or text messaging consent with third parties or affiliates for marketing purposes, lead generation, or third-party analytics.

HR360 may use SMS/text messaging vendors only after Contracting, IT Security, and Compliance/Privacy confirm that appropriate contractual and security requirements are in place. Depending on the information involved, these requirements may include a HIPAA Business Associate Agreement, 42 CFR Part 2 Qualified Service Organization or lawful-holder protections, subcontractor flow-down obligations, breach and security-incident notice obligations, access controls, audit logging, encryption and secure transmission/storage controls where available, data retention, deletion, and export requirements, cooperation with opt-out suppression and reassigned-number handling, and restrictions on vendor use of HR360 data. Vendors may not sell, rent, disclose, mine, profile, advertise to, train AI or machine-learning models with, or otherwise use HR360 SMS-related data except as expressly authorized in writing by HR360 and permitted by law.

HR360 will only disclose information required by law and will only respond to subpoenas, court orders, mandatory reports, and health/safety situations only after review under HIPAA, Part 2, CMIA, LPS, California SUD confidentiality law, and HR360 policy.

5. Substance Use Disorder and Other Sensitive Information

HR360 services may involve especially sensitive information, including substance use disorder treatment information, mental health information, housing-related information, HIV-related information, and other protected or confidential information. For the current ECM outreach launch, HR360 will not include diagnosis, treatment, substance use disorder, mental health, housing status, or other sensitive information in initial outreach text messages.

Because text messaging is not always a fully secure method of communication, HR360 seeks to limit sensitive information sent by SMS. If you send HR360 sensitive information by text, HR360 may move the communication to a more secure or appropriate channel. HR360 may document the communication in its records as required or permitted by law and HR360 policy.

6. Security

HR360 uses administrative, technical, and physical safeguards designed to protect your information. HR360 requires authorized text messaging service providers to maintain appropriate security, access, retention, deletion, and incident-response controls consistent with applicable law and contract requirements. Even so, text messaging is not a completely secure form of communication, and messages may be subject to delay, interception, or access by others who use your phone or mobile account.

By opting in to SMS communications, you acknowledge these risks. If you prefer not to receive text messages due to privacy concerns, you may opt out or request an alternative communication method when available.

Any suspected unauthorized access, use, disclosure, loss, misdirection, wrong-number texting, texting to a reassigned number, opt-out failure, vendor incident, security incident, or text message containing sensitive information must be reported immediately through HR360's privacy and security incident-reporting process. HR360 will evaluate and respond to such incidents under applicable law and HR360 policy, including HIPAA, 42 CFR Part 2 breach requirements, CMIA, California breach-notification requirements, contractual obligations, mitigation requirements, and any applicable health plan or delegated-entity reporting obligations.

7. Consent

Where required by applicable law, contract, or HR360 policy, HR360 will obtain or document consent or other authority before sending text messages. For the current ECM outreach launch, HR360 may send initial outreach texts to a mobile number provided directly by you or supplied to HR360 by a health plan or other authorized source for outreach, where permitted by law, contract, or delegated authority.

Consent to receive SMS/text messages is consent to use the text-message communication channel only. It is not a HIPAA authorization, 42 CFR Part 2 consent, California CMIA authorization, or other legal authorization to disclose medical, mental health, substance use disorder, HIV-related, reproductive or sexual health, housing, financial, or other sensitive information by text. HR360 will not use SMS/text messaging to disclose such information unless the disclosure is separately permitted by applicable law, contract, and HR360 policy.

Consent to receive text messages is voluntary and is not a condition of receiving HR360 services. Your choice to receive or not receive text messages will not affect your ability to access services, and you may request an alternative communication method when available.

8. Opting Out

You may opt out of receiving HealthRIGHT 360 text messages at any time. To stop receiving text messages, reply STOP to any HealthRIGHT 360 message. You may also use other words or phrases that clearly show you no longer want to receive text messages, such as CANCEL, END, QUIT, UNSUBSCRIBE, “do not text me,” or “no more texts.”

After you opt out, you may receive one confirmation message indicating that you have been unsubscribed. If you receive a message from HR360 in error or the number has been reassigned, please reply STOP or contact us using the information below, and HR360 will make reasonable efforts to suppress the number from future outreach.

9. Help

For assistance with text messaging services, reply HELP to any message, contact the HealthRIGHT 360 Privacy Office at privacy@healthright360.org or <https://www.healthright360.org/contact-us/> for current contact options.

If you are experiencing a medical emergency, call 911.

10. Message Frequency and Carrier Charges

Message frequency may vary. For the current ECM outreach launch, HR360 expects to send a limited number of messages unless you reply or request follow-up. Messages may be sent periodically or as needed to support the communication you requested.

Message and data rates may apply depending on your mobile carrier and plan. Check your mobile plan for details.

11. Record Retention

HR360 retains SMS-related information according to HR360’s Record Retention Schedule and the record type involved, including patient or client records, consent and opt-out records, compliance/audit records, campaign records, and vendor records. SMS-related information maintained by authorized service providers must be retained only for the contractually approved period and must be deleted, returned, or exported at HR360’s direction unless a legal hold or other legal requirement applies. HR360 may retain opt-out and suppression information as long as necessary to honor opt-out requests, prevent future unauthorized contact, document compliance, and comply with law, contract, or HR360 policy.

12. Your Privacy Rights

You have rights regarding your health and personal information under federal and California law. For more information about how HR360 uses and protects health information, please review our [Notice of Privacy Practices](#).

This SMS Privacy Policy is intended to supplement, and not replace, HR360's Notice of Privacy Practices and any applicable 42 CFR Part 2 Patient Notice. To the extent SMS-related information is protected health information, Part 2 information, medical information, mental health information, HIV-related information, or other specially protected information, HR360 will handle that information consistent with those notices, applicable law, and HR360 policy.

HR360 will not publish this policy or expand SMS/text messaging beyond the current approved ECM outreach use unless Compliance/Privacy confirms that HR360's Notice of Privacy Practices and any applicable Part 2 Patient Notice are current and aligned with the SMS program.

13. Changes to This Policy

We may update this SMS Privacy Policy from time to time. Any changes will be posted on our website with an updated effective date. Material changes to the scope, purpose, content, recipient population, vendor, sender identification, link, landing page, or response workflow for HR360 text messaging require Compliance/Privacy review and approval before implementation.

14. Contact Us

If you have questions about this SMS Privacy Policy or HR360's text messaging practices, contact HealthRIGHT 360 through the current contact options below:

HealthRIGHT 360

privacy@healthright360.org

<https://www.healthright360.org/contact-us/>