



11. Notice of Privacy Practices — Business Associate Role

Clinitect.ai · compliance/11-notice-of-privacy-practices.md

Effective Date: 2026-04-24 **Owner:** Privacy Officer **Review Cadence:** Annually **Authority:** 45 CFR §§ 164.520, 164.502(e)

A note on scope

Under HIPAA, the formal "Notice of Privacy Practices" (NPP) is a document that **Covered Entities** provide to individual patients. Clinitect.ai is a **Business Associate**, not a Covered Entity, and therefore does not issue an NPP to individuals directly.

However, Clinitect.ai maintains this document as its **public-facing privacy statement** — a plain-English summary of how we handle data received from customer Covered Entities, suitable for publication on our website (`clinitect.ai/privacy` when the domain is provisioned).

This document does **not** replace or substitute for a Covered Entity's own Notice of Privacy Practices. It describes what Clinitect.ai does with the data we receive from them.

What we do

Clinitect.ai is a software platform used by clinicians to rewrite and restructure clinical documentation using artificial intelligence. Our customers are healthcare providers (Covered Entities under HIPAA) who use our service to process Protected Health Information.

How we handle data

1. Data we receive

When a clinician uses Clinitect.ai, we receive:

- **The clinical transcript or note** they paste into our application, which may contain Protected Health Information (names, dates of birth, medical record numbers, diagnoses, and so on).
- Optional **images or PDFs** of clinical documents, which we process via OCR to extract the text.
- **Instructions** the clinician types for how the AI should rewrite the note (for example, "convert this to a SOAP note").

2. What we do with it

1. We identify Protected Health Information in the text using AWS Comprehend Medical — an AWS service covered by our Business Associate Agreement.

2. We replace every identifier with a placeholder token (for example, [NAME_001] for a patient's name, [DATE_001] for a date).
3. We send **only the placeholder-protected text** to a language model running on AWS Bedrock.
4. The language model returns its response using the same placeholder tokens.
5. We swap the placeholders back to the real values on our server.
6. We return the final note to the clinician.
7. We destroy the mapping between placeholders and real values within about one second of the response being sent.

3. What we store

- Saved notes that a clinician explicitly chooses to save to a project on their Clinitect.ai account. These are encrypted at rest.
- User account information (email address, name) for sign-in.
- Usage counters used to enforce rate limits and generate aggregate business metrics.
- Application and AWS audit logs. These logs **never contain actual patient data** — only counts and metadata (timestamps, user IDs, action names).

4. What we do NOT store

- Raw clinical transcripts. These are processed and returned, not persisted server-side (unless a clinician explicitly saves one).
- The mapping between placeholder tokens and real patient identifiers. This exists only in process memory for the duration of a single API call.
- Any data shared with the language model or the model's provider (Amazon, Meta, Anthropic). Model providers never receive the data; AWS Bedrock is the intermediary.

5. What we never do

- **We never share Protected Health Information with any third party outside of AWS.** Not OpenAI, not ChatGPT, not Google, not Anthropic direct.
- **We never use your data to train any AI model.** AWS Bedrock is contractually prohibited from doing so.
- **We never sell or rent your data.**
- **We never use your data for marketing or advertising.**

6. Our legal basis

As a Business Associate, Clinitect.ai processes Protected Health Information only as permitted under:

- The Business Associate Agreement executed with each Covered Entity customer.
- The Privacy Rule permitted uses and disclosures (45 CFR §§ 164.502, 164.504).
- The Security Rule administrative, physical, and technical safeguards (45 CFR §§ 164.308–312).

We do not process Protected Health Information for any purpose outside the scope of these agreements and rules.

Your rights (as an individual patient)

Under HIPAA, individuals have rights that are exercised **through their healthcare provider** (the Covered Entity), not directly with Clinitect.ai. These include the right to:

- Request access to your health information.
- Request amendments to your health information.
- Request an accounting of disclosures.
- Request restrictions on how your health information is used.
- File a complaint about privacy practices.

If you want to exercise any of these rights, please contact the healthcare provider you received care from. They will direct requests to us if our participation is needed, and we will respond as required by their Business Associate Agreement with us.

If you believe your privacy has been violated

You may file a complaint:

1. With the healthcare provider who received your care. They are responsible for the protection of your Protected Health Information and for overseeing Business Associates like us.
2. With us directly, by emailing `tech@riverlogictech.com` (pending `privacy@clinitect.ai` when the domain is provisioned). We will acknowledge receipt within three business days and respond substantively within thirty calendar days.
3. With the U.S. Department of Health & Human Services Office for Civil Rights at `ocrcomplaint@hhs.gov` or 1-800-368-1019.

We will not retaliate against any individual for filing a complaint.

Changes to this Notice

We may update this document from time to time. The effective date at the top reflects the most recent revision. The authoritative version is maintained at clinitect.ai/docs/compliance/11-notice-of-privacy-practices.md (or `clinitect.ai/privacy` when the domain is provisioned).

Contact

For questions about this Notice or about how Clinitect.ai handles your Protected Health Information:

- **Privacy Officer:** Deep Patel
- **Email:** `tech@riverlogictech.com` (will become `privacy@clinitect.ai`)

