



MEMBER PRIVACY NOTICE

(Effective: June 30, 2026)

This Notice describes how Recovery Café Lexington may use or disclose personal identifying information (“PII”) you choose to share with us when you enroll and participate in Recovery Café activities, as well as your rights and choices, and our responsibilities related to the use and disclosure of your PII. References in this Notice to Recovery Café Lexington or “RCL” includes Recovery Café Frankfort which is a division of RCL, RCL staff members, directors, officers and authorized volunteers. PII means your name and other information that individually identifies you, e.g., your date of birth, address, phone number, email address, social media ID. It may also include demographic, health or substance use information that can be used to identify you.

Who We Are: Recovery Café Lexington is a non-profit, peer-led, peer-run recovery community center and part of the national Recovery Café Network. Café membership is free. We do not bill members or any third party for any services. We receive financial support from state agencies such as the Kentucky Opioid Response Effort (K.O.R.E.), a division of the Kentucky Cabinet for Health and Family Services Department for Behavioral Health, Developmental, and Intellectual Disabilities. We are not however, a substance use disorder (“SUD”) treatment program, nor do we provide any clinical medical or behavioral health care services.

Data We Collect: Recovery Café collects PII and other information members voluntarily self-report to us when they enroll for Café membership, during their participation in certain Recovery Café activities like Recovery Coaching or to apply for specific grant programs available through RCL. We maintain this information in the national Recovery Café Network secure database. Except as explained in this Notice, before disclosing members’ information to third parties, RCL typically de-identifies (removes all PII) and creates aggregated statistical data from it. The national Network commits to keeping all member PII stored in its database confidential and to not re-disclose it to third parties without appropriate authorization, other than when disclosure is required or permitted by law.

OUR USES AND DISCLOSURES. When you enroll as a Café member, you represent that you have read this Notice, and generally consent to our using and sharing your PII in the ways explained in this Notice. While RCL most often only discloses member information in de-identified, aggregated form to third parties, to the extent we disclose member PII to a third-party, we expect that third party to maintain its confidentiality and not redisclose it without the member’s prior written consent, except as permitted or required by law. Ways in which RCL may use or share your member information include:

- To support your participation in RCL programming.
- To help Recovery Coaches connect you with community resources when you request their assistance.

- To manage our internal operations, track program outcomes and measure the impact of RCL's services.
- To fulfill our reporting obligations to government agencies that help fund our services and operations, and to coordinate programming with the national Recovery Café Network. This may include reporting some basic identifying information like member dates of birth along with demographic data to track outcomes, develop evidence-based best practices for delivering recovery services that meet member needs, and to evaluate and audit our program. The national Network uses this data for national program evaluation, outcome tracking, Network coordination, and funding support.
- With anyone to whom you expressly authorize us in writing to disclose it, such as your treating health care provider or a trusted family member.
- With an individual who is your legal guardian or has your medical power of attorney upon their request. We will make sure the requesting individual is legally authorized to act for you before disclosing your PII to them.
- When necessary for your health and safety and others, with first responders or law enforcement during a medical or other emergency at Recovery Café.
- With a representative of one of our funding agencies or organizations during the course of a routine evaluation or audit of our program.
- In de-identified form with public health officials for disease prevention.
- With law enforcement or the coroner as necessary to identify a deceased member or determine their cause of death.
- To the extent required by law to report suspected child abuse and neglect.
- With law enforcement in the event a member commits or threatens to commit a crime on RCL premises, against our staff, or against another Café member.
- In response to a court order or subpoena in legal proceedings to which you are a party. We will attempt to contact you before responding to the order and subpoena.
- To respond to legal proceedings brought against RCL.

SUBSTANCE USE DISORDER TREATMENT RECORDS. Patient's treatment records maintained by a substance use disorder ("SUD") treatment program have special privacy protections under the federal regulations at 42 CFR Part 2 ("Part 2") and HIPAA. RCL does not normally request or receive member treatment records from SUD programs covered by those laws. In the rare event a member authorizes an SUD program where they have been a patient to disclose records to RCL for a specific purpose (e.g., to verify their eligibility for a grant program), and RCL receives the records, we will not further disclose them without the member's express written consent, except as permitted or required by law. If the member consents in writing to RCL disclosing the records to a third party, we will notify that third party in writing of its obligations under Part 2 to protect the privacy of the disclosed records.

YOUR RIGHTS AND CHOICES. With respect to how we use or share your PII, you have the right to:

- Receive a copy of this Notice.
- Ask questions about how we use or disclose your PII.
- Decline to answer any question on any RCL form without affecting your membership.

- Request RCL in writing to stop disclosing your PII to an outside party. We will honor your request except to the extent the disclosure has already been made or is permitted or required by law. Doing so, however, may affect your ability to continue as a member as sharing member data with the national Recovery Café Network and funding agencies is an inherent part of Café membership.
- If you wish to participate in a specific grant program available through RCL, you may be asked to sign a separate authorization for release by RCL to a third-party or by a third-party to RCL of additional PII directly related to the grant program. It is your choice whether to sign such an authorization. Declining to do so will not affect your Café membership, but could impact your application to participate in the grant program if the program requires information covered by the authorization to determine your eligibility.

OUR RESPONSIBILITIES.

- RCL will not use or share your information without your express written consent except as described in this Notice. If you provide such written consent, you may later revoke it in writing.
- RCL uses its best efforts to keep member information confidential. However, we are not a health care provider or SUD program subject to federal regulation under the HIPAA Privacy and Security Rules or 42 CFR Part 2 (“Part 2”) which affords additional protections for patient treatment records maintained by SUD programs. This means that RCL cannot in any way guarantee your member PII will never be subject to unauthorized access or disclosure in response to a law enforcement request, court order, or subpoena.
- We will notify you using the most recent contact information we have if an event occurs that may have compromised the privacy of your PII, or we are requested or required to disclose your PII to law enforcement or in response to a court order and/or subpoena, to the extent permitted by law.

CHANGES TO THIS NOTICE. We will follow the terms of this Notice that are currently in effect. We can change the terms of this Notice in our discretion. If we do, the changes will apply to the information we have about you. The new Notice will be available upon request at RCL, 1109 Versailles Rd., Ste. 200, Lexington, KY 40508, and on the RCL website at <https://recoverycafelexington.org>.