Privacy / data-handling note

From: Noah Kim, Privacy **To:** GRC **Date:** 2027-09-17

I have not classified every Member Assist message as PHI. Free-text member messages **can** include names, contact details, account numbers, billing questions, care-navigation language, and sometimes health-related descriptions. That is **incidental possibility**, not a statement that every row is PHI.

Please do **not** write a legal conclusion in the GRC brief. I need GRC to tell me:

- What data is necessary for this use vs convenient
- Whether attachments or pasted text reach CedarLM
- Retention of prompts/outputs and who can access them
- Whether customer content may train Pallet or CedarLM
- Whether Harborline can delete prompts/outputs on request
- Where processing occurs

Until those are evidenced, treat sensitive-data handling as **unverified**. Escalate to Privacy/Legal rather than deciding HIPAA scope yourselves.