

## Aaron T. Maguregui

### Partner

[amaguregui@foley.com](mailto:amaguregui@foley.com)

Tampa

813.225.4129



Aaron Maguregui is the catalyst driving success for early-stage health tech startups, Fortune 500 health care organizations, digital health technology companies, health care AI innovators, and general counsels seeking expert legal guidance. As a leading digital health attorney and health care AI lawyer, Aaron specializes in health technology and patient engagement strategy, AI-driven innovation, e-commerce and technology platform negotiations and transitions, and comprehensive privacy and data governance strategy. He was recently selected to serve as Chair of the Artificial Intelligence Committee for the American Telemedicine Association, reflecting his national leadership in the intersection of AI and virtual care. With more than a decade of experience, he helps digital health CEOs, health care attorneys, retail pharmacies, health and hospital systems, pharmaceutical companies, and health care payors turn complex AI governance, HIPAA, TCPA, CMIA, CCPA, CPRA, state privacy, and telehealth regulations into strategic competitive advantages. By designing airtight HIPAA compliance programs, guiding secure e-commerce platform migrations, implementing robust cybersecurity protocols, and negotiating seamless EHR and telehealth data sharing agreements, Aaron enables clients to accelerate product launches, build patient trust, and unlock new revenue opportunities.

- **Enterprise AI Transactions:** Aaron structures and negotiates enterprise-wide AI licensing and services agreements for digital health companies and healthcare organizations, enabling deployment of foundational and agentic AI tools across clinical, operational, and product teams. He advises on platform access rights, integration workflows, intellectual property protections, and data use restrictions while embedding privacy safeguards and governance controls to support responsible and scalable AI adoption.
- **Accelerated Compliance & Privacy:** Aaron empowers clients to launch HIPAA and TCPA compliant outreach campaigns, telehealth vendor agreements, and EHR contracts with minimal delays — minimizing audit risk and maximizing patient engagement.

- **EHR and Data Integration & Strategy:** Aaron has led and negotiated large scale EHR implementation and integration contracts for primary care organizations, retail pharmacies, and health systems — ensuring interoperability, cybersecurity safeguards, and HIPAA compliance while accelerating go-live timelines.
- **Telemedicine e-Commerce Launch:** Aaron directs direct-to-consumer telehealth providers through e-Commerce platform transitions, embedding secure billing workflows, HIPAA-compliant user experiences, and robust data governance to drive patient acquisition.
- **AI Governance for Expansion:** From health care AI startups to medical device manufacturers, Aaron develops AI governance frameworks and drafts HIPAA, GDPR, and CCPA-compliant data-use agreements — enabling international scalability and fostering regulatory confidence.
- **Health Care Contracts & Supply Chain:** As a seasoned health care contracts lawyer, Aaron structures master supply chain agreements and vendor contracts for digital health platform companies, retail pharmacies, and health IT vendors — optimizing procurement, mitigating data and privacy risks, and embedding data security requirements.
- **Telehealth Platform Negotiations:** He leads negotiations for nationwide telehealth platform agreements, integrating virtual care into clinical workflows and ensuring telehealth regulatory compliance reducing time to market for virtual care services.
- **User-Centered Digital Experiences:** Aaron advises on the design of compliant, optimized user workflows and privacy controls for mobile health apps and telehealth websites. His expertise in FTC compliance, patient authentication protocols, and mobile app data security ensures regulatory adherence and superior patient experiences.
- **Practical and Results Focused Approach:** Aaron combines his in-house legal experience at a Fortune 100 managed care organization with his global law firm practice experience to provide practical legal guidance on platform deployments, AI compliance, and multi-state telehealth rollouts. He stays current on regulatory developments to help clients navigate challenges and implement solutions effectively.

Aaron's blog and speaking engagements offer practical guidance on developing and implementing HIPAA compliance programs, navigating telehealth regulations, and leveraging AI-driven legal strategies for digital health platform implementations. Read his latest articles for step-by-step advice on data governance frameworks, telehealth integrations, and cybersecurity protocols. For assistance with EHR and technology platform implementations, telehealth vendor contracts, health care AI governance, or HIPAA-compliant mobile app design, contact Aaron to discuss how he can translate legal requirements into actionable, growth-focused solutions.

## Representative Experience

- **Enterprise Licensing for Foundational AI Model:** Negotiated an enterprise-wide technology agreement with a leading large language model provider to support internal deployment of generative AI tools across product, engineering, and operational teams. The transaction included broad licensing rights, model customization terms, integration support, and usage boundaries. The agreement also

addressed data handling safeguards, internal use restrictions, and privacy compliance measures to support deployment across regulated environments.

- **Agentic AI Services and Integration Agreement:** Structured a multi-year enterprise agreement with an agentic AI vendor delivering autonomous workflow capabilities for intake, patient support, and administrative operations. The engagement covered platform access, API integrations, intellectual property terms, and service level commitments. Privacy-related provisions included controls around system inputs and outputs, security standards for user data, and limitations on downstream use of customer data to mitigate regulatory and reputational risks.
- **EHR Agreement:** Negotiated and structured a multi-year EHR agreement for a national care delivery primary care organization, ensuring interoperability standards, cybersecurity safeguards, and HIPAA compliance across all clinic locations.
- **Platform Transition:** Guided a direct-to-consumer telehealth company through the negotiation and transition to an e-commerce subscription platform for telemedicine services, embedding secure billing workflows, HIPAA-compliant UX, and robust data governance measures.
- **Retail Eyewear & Vision Services:** Represented an international online retail eyewear company in the negotiation, launch, and ongoing compliance efforts of its virtual, technology-enabled vision services offering.
- **AI Governance:** Advised a digital health startup on an AI governance framework and drafted GDPR and CCPA-compliant data-sharing agreements for international expansion of a health care AI analytics platform.
- **GPO Contracting:** Represented a global health care group purchasing organization, responsible for over 30 national health care entities, in re-contracting efforts with its primary data analytics vendor, negotiating a primary data use licensing agreement, governance agreement, and master vendor services agreement to enhance data accessibility and compliance.
- **Telehealth Platform:** Led the negotiation of a country-wide telehealth platform agreement for a major health network, integrating virtual care services into clinical workflows and ensuring telehealth regulatory compliance.
- **UX Design:** Designed and reviewed user journey workflows for a mobile mental health app, ensuring HIPAA privacy, secure authentication, and FTC-compliant data collection practices.
- **Supply Chain Agreement:** Structured a master supply chain agreement for a national pharmaceutical distributor, optimizing procurement processes and mitigating regulatory risk under CMIA and federal privacy laws.
- **Data Governance:** Developed a data governance roadmap for a health care AI company, aligning algorithmic data usage policies with HIPAA, state AI regulatory requirements, and cloud data security best practices.
- **DTC Telehealth UX:** Represented a large direct-to-consumer telehealth company in designing and developing user experience workflows, ensuring compliance with FTC regulations and enhancing patient acquisition and marketing effectiveness.
- **Retail Pharmacy EHR:** Negotiated on behalf of a large retail pharmacy a complex EHR agreement, integrating specialty pharmacy systems with enterprise EHR platforms, ensuring HIPAA compliance,

interoperability, and optimized medication dispensing workflows.

- **Platform Licensing:** Represented a large retail pharmacy chain in negotiating a telehealth platform licensing agreement with a nationwide telehealth platform provider, ensuring privacy-by-design, cybersecurity safeguards, and PHI protection.
- **White Label Partnership:** Represented a virtual care platform in negotiating with a pharmaceutical company to establish a white-labeled direct-to-consumer telehealth offering, aligning branding, compliance, and operational workflows to streamline launch and patient engagement.

**“Foley is the premier firm for telehealth counsel.”**

**“A market leader in telemedicine issues.” “This is the Dream Team.”**

– Chambers USA: America’s Leading Business Lawyers (2020 – 2021)

## **Presentations and Publications**

- Co-author, “AI-Powered Text Messaging by Digital Health Companies: Supreme Court Raises the Stakes,” *Health Care Law Today* (July 2, 2025)
- Co-author, “AI Contracts in Health Care: Avoiding the Data Dumpster Fire,” *Health Care Law Today* (June 25, 2025)
- Co-author, “HIPAA Risk Analyses for Digital Health: Navigating AI, M&A and Vendor Diligence,” *Health Care Law Today* (June 18, 2025)
- Co-author, “HIPAA Compliance Risks with AI Scribes in Health Care: What Digital Health Leaders Need to Know,” *Health Care Law Today* (June 9, 2025)
- Co-author, “The Intersection of AI, Digital Health, and the TCPA: What You Need to Know,” *Health Care Law Today* (May 28, 2025)
- Co-author, “Cybersecurity in Digital Health: Why HIPAA Compliance Alone Is Not Enough for M&A Success,” *Health Care Law Today* (May 20, 2025)
- Co-author, “5 Key Contracting Considerations for Digital Health Companies Working with AI Vendors,” *Health Care Law Today* (May 15, 2025)
- Co-author, “HIPAA Compliance for AI in Digital Health: What Privacy Officers Need to Know,” *Health Care Law Today* (May 8, 2025)
- “How updated third-party tech guidance affects compliance efforts.” *TechTarget* (May 2, 2025) (quoted)
- Co-author, “New York’s Proposed Health Information Privacy Act Takes Aim at Digital Health Companies,” *Health Care Law Today* (January 23, 2025)
- “Health Supply-Chain Hacks Targeted by HHS Cybersecurity Rule,” *Bloomberg Law* (January 13, 2025) (quoted)

- Co-author, “HHS Proposes Changes to Strengthen HIPAA Security Rule,” *Health Care Law Today* (January 6, 2025)
- Co-author, “HIPAA Reproductive Health Care Amendments: Compliance in an Uncertain Enforcement Landscape,” *Health Care Law Today* (December 19, 2024)
- Co-author, “OCR Says HIPAA Audits Will Resume: OIG Makes Recommendations for Enhancement,” *Health Care Law Today* (December 9, 2024)
- Co-author, “Artificial Intelligence in Health Care: Key Considerations for Oncology,” *Health Care Law Today* (September 25, 2024)
- Speaker, “Designing Effective Patient Engagement Strategies for RPM Adoption and Adherence,” 2024 Remote Patient Monitoring Summit (September 23, 2024)
- Co-author, “What Goes Around Comes Around: The Resurgence of Data Breach Class Actions,” *Innovative Technology Insights* (July 22, 2024)
- Co-author, “HIPAA: Amendments to Protect Reproductive Health Care Information Can Now be Implemented with OCR’s Final Rule,” *Health Care Law Today* (July 2, 2024)
- Speaker, “Teamwork, Collaboration, and Intellectual Property: Common Pitfalls and Myths,” ATA Nexus 2024 (May 6, 2024)
- “How updated third-party tech guidance affects compliance efforts,” *HealthITSecurity* (May 2, 2024) (quoted)
- “Update to HHS’ controversial web tracker guidance offers little practical relief, legal experts say,” *Fierce Healthcare* (March 21, 2024) (quoted)
- Co-author, “HHS Updates Pixels and Trackers Guidance for HIPAA Regulated Entities,” *Health Care Law Today* (March 19, 2024)
- Co-author, “HIPAA and Part 2 Harmonized: What Health Care Organizations Need to Know,” *Health Care Law Today* (February 12, 2024)
- Speaker, “Clinical Implications of AI,” Blue Cirrus Consulting (January 17, 2024)
- Co-author, “AI in Health Care: Powering Patient Outcomes,” *Innovative Technology Insights* (December 11, 2023)
- Speaker, “Online Tracking Technologies: Implications under HIPAA and Beyond,” Business Research Intelligence Network’s Telehealth & Digital Healthcare Management Summit (January 22, 2024)
- Co-author, “Telehealth Providers: HHS Issues HIPAA Best Practices,” *Health Care Law Today* (November 17, 2023)
- Speaker, “Unlocking Strategies for Telehealth Privacy,” ATA EDGE2023 Policy Conference (December 13, 2023)
- Speaker, “Online Tracking Technologies: Implications under HIPAA and Beyond,” 2023 North Country Leadership Summit (September 28, 2023)
- Speaker, “Health Law Privacy/Security Update,” Association of Corporate Counsel (September 19, 2023)
- Speaker, “Online Tracking Technologies: Implications under HIPAA and Beyond,” 9th Annual Northeast Regional Telehealth Conference (September 18, 2023)

- Co-author, “Key Contractual Considerations for Health AI and Hospital Collaborations,” *Health Care Law Today* (September 14, 2023)
- Speaker, “AI & Machine Learning in Health Care,” Blue Cirrus Consulting (June 21, 2023)
- Speaker, “Telehealth Law & Policy Panel,” 2023 California Telehealth Summit (June 14, 2023)
- Co-author, “Florida’s New Prohibition on Offshoring Patient Information,” *Health Care Law Today* (May 22, 2023)
- Co-author, “2023 Telemedicine & Digital Health Trends,” *Foley Forward: Trends 2023* (March 29, 2023)
- “FTC’s ‘Click to Cancel’ Proposal Escalates Legal Peril for Sellers,” *Corporate Counsel* (March 23, 2023) (quoted)
- Speaker, “Digital Health Law: 2023,” Health Tech Nerds (January 19, 2023)
- Speaker, “Cracking Down on Security Risks,” ATA EDGE Policy Conference (December 7, 2022)
- Co-author, “HHS Proposes to Align Federal Substance Use Disorder Law with HIPAA,” *Innovative Technology Insights* (November 30, 2022)
- Speaker, “The Legal Landscape of Telemedicine,” 2022 Florida Telehealth Forum – Telehealth in a Post-COVID World (September 23, 2022)
- Co-author, “HIPAA & Telehealth: FAQs from HHS Guidance on Audio-Only Telehealth,” *Foley Blogs* (June 16, 2022)
- “Regulatory risk in the business of telehealth,” *Healthcare Finance News* (May 2, 2022) (quoted)
- Speaker, “The Business of Telehealth: Legal Issues Around Telehealth,” ATA2022 Annual Conference & Expo (May 1, 2022)
- Author, “The Costs and Rewards of Patient Data in the New Era of Telemedicine,” *Entrepreneur* (April 12, 2022)
- Co-author, “Four Key Takeaways for Digital Health Companies from the FTC’s Recent COPPA Settlement,” *Foley Blogs* (January 9, 2022)
- Co-author, “Digital Health Apps Must Allow Users to Delete Accounts, Per New Apple App Store Rules,” *Foley Blogs* (October 10, 2021)
- Co-author, “Top 5 FAQs on the FTC’s Warning to Health Apps to Report Breaches of Health Data,” *Health Care Law Today* (September 20, 2021)
- Co-author, “Five To-Do’s for Telemed Companies Before the Public Health Emergency Ends,” *Bloomberg Law* (May 26, 2021)
- “Supreme Court Ruling May Help Providers With mHealth Messaging Strategies,” *mHealth Intelligence* (April 12, 2021) (quoted)
- Co-author, “Telemedicine, Texting, and TCPA: Telephone Consumer Protection Act Update,” *Foley Blogs* (April 6, 2021)
- Co-author, “FAQs on Telemedicine and HIPAA During the Public Health Emergency,” *Foley Blogs* (March 29, 2021)
- Co-author, “Telemedicine and Texting: Telephone Consumer Protection Act,” *Health Care Law Today* (March 8, 2021)

- Co-author, “Telehealth Equity Coalition Seeks to Improve Telehealth Equity for All,” *Foley Blogs* (February 22, 2021)
- Co-author, “Appeals Court Vacates HIPAA Penalty Imposed Against M.D. Anderson,” *Foley Blogs* (January 29, 2021)
- Co-author, “OCR Relaxes Enforcement on Providers Using Scheduling Apps for COVID-19 Vaccinations,” *Health Care Law Today* (January 26, 2021)
- Co-author, “Key Findings & Takeaways from OCR HIPAA Audit Findings,” *Foley Blogs* (January 15, 2021)
- Co-author, “Top 5 Telehealth Law Predictions for 2021,” *Foley Blogs* (January 12, 2021)
- Co-author, “Proposed Modifications to HIPAA Expands Individual Access Rights and Encourages Further Sharing of PHI for Care Coordination,” *Foley Blogs* (December 14, 2020)
- Co-author, “Remote Patient Monitoring Platforms Get New Cybersecurity and Privacy Guidelines,” *Health Care Law Today* (December 9, 2020)
- Co-author, “European Commission Publishes Draft Standard Contractual Clauses,” *Innovative Technology Insights* (December 7, 2020)
- Co-author, “Apple Requiring App Developers to Disclose Privacy Details in App Store,” *Foley Blogs* (December 4, 2020)
- Co-author, “European Data Protection Board Issues Recommendations for Exports of Personal Data From the European Economic Area,” *Innovative Technology Insights* (December 1, 2020)

## Affiliations

- Member of the International Association of Privacy Professionals
- Member of the American Health Lawyers Association
- Member of the Health Law Section of the Florida Bar
- Chaired the American Telemedicine Association’s (ATA) Data Work Group in developing its Artificial Intelligence Principles (2023)
- Co-chaired ATA’s Health Data Work Group’s Privacy Committee

## Community Involvement

- Member of the board of directors for the Jason Ackerman Foundation/Because of Jason

## Sectors

- [Artificial Intelligence](#)
- [Health Care & Life Sciences](#)
- [Innovative Technology](#)
- [Telemedicine & Digital Health](#)

## Practice Areas

- [Behavioral Health](#)
- [Cybersecurity](#)



FOLEY & LARDNER LLP

- Health Care
- Health Care Regulatory
- Intellectual Property
- Privacy, Security & Information Management
- Technology Transactions, Cybersecurity, and Privacy

## Education

- Indiana University Maurer School of Law (J.D., 2010)
- University of South Florida (B.A., 2007)

## Admissions

- Florida
- Washington, D.C.