

Important Insurance Benefit Administrators Privacy Notice

Effective date: Aug. 1, 2018

This notice describes how your medical information may be used and disclosed and how you can get access to this information. Please review this information carefully.

www.insurancebenefitadministrators.com

This notice also is provided on behalf of the insurance carrier for your insurance plan.

Insurance Benefit Administrators (and its affiliates, collectively referred to as "IBA") has adhered to strict client confidentiality policies and practices. IBA is committed not only to providing superior insurance products, administration and service, but to protecting the privacy of its clients. To comply with applicable law and regulation, IBA is required to maintain and abide by the following **Privacy Policies and Practices** and to provide its clients with this notice. Please be assured that:

- All health, medical, insurance, employment, business, financial or other personal, non-public or protected health information you disclose to us ("Protected Information") is maintained by IBA in secured hard copy and system files, with restricted access.
- Protected Information remains completely confidential and is disclosed only as is minimally necessary to administer or service your account for insurance purposes.
- IBA does not sell Protected Information to any third party, for any reason.
- It is not necessary for you to reply to this notice, or to take any other action, in order for your Protected Information to remain completely secure and confidential.

This notice may be revised within IBA's discretion to comply with applicable law and regulation. Any such revision shall apply to all of your past, present and future Protected Information maintained by IBA, on and after the effective date of that revision or its distribution to you, whichever date is later.

Privacy Policies and Practices

I. Commitment to Client Privacy

- A. IBA values and respects the privacy and confidentiality of its clients, and desires to safeguard, secure and protect Protected Information.
- B. IBA recognizes its legal and ethical duty to safeguard, secure and protect Protected Information.
- C. IBA shall maintain and abide by strict policies and practices to safeguard, secure and protect Protected Information.

II. Definitions

- A. **Clients:** All prospective, current and former individual clients of IBA, who have inquired about, applied for, or obtained insurance or benefit products or services from IBA, for personal, family or household purposes, and in doing so have shared or disclosed personal, non-public or protected health information with IBA.
- B. **Protected Information:** All information that personally identifies a Client and is not otherwise available to the public, which may generally include, but is not limited to, name, address, date of birth, social security number, telephone number, credit history, income, assets, investments, debts, marital status, tax filing status, dependent obligations, premiums, insurance coverage and claims, health history, medical treatment, medical information, business information and employment history.
- C. **Affiliates:** All companies or other legal entities, including all individuals employed by those entities, under common control or ownership with Insurance Benefit Administrators.

- D. Non-Affiliated Third Parties: All companies or other legal entities and individuals not under common control or ownership with Insurance Benefit Administrators, including but not limited to:
1. insurance carriers, benefit plans, preferred provider networks, attorneys, accountants, actuaries and other companies or individuals on contract with or consulting for IBA.
 2. medical information bureaus, government agencies, third parties via court order or subpoena and other insurance industry, regulatory or legally required entities or individuals.
 3. medical providers, insurance agents, prior insurance carriers, prior benefit plans, custodians for medical records and other entities or individuals possessing insurance, medical or health information or documentation of a Client.
 4. all other Non-Affiliated Third Parties not included in numbers 1, 2 and 3 above.

III. Collecting and Disclosing Protected Information

- A. IBA collects and discloses only that Protected Information which is minimally necessary to:
1. provide or administer the product or service requested by the Client, including underwriting, claims adjudication, case management and investigation;
 2. allow IBA to provide superior products and services;
 3. comply with applicable law and regulation;
 4. respond to a Client inquiry or complaint;
 5. protect and safeguard Protected Information and IBA records;
 6. take any other action authorized and requested by the Client; or
 7. otherwise effect, administer or enforce a Client requested product, service or transaction, or perform any insurance function.
- B. IBA collects the majority of Protected Information directly from the Client during the application or enrollment process, and then subsequently as requested by the Client to administer benefits or to change or adjust product coverage and/or service.
- C. Confidential Information will not be collected from or disclosed to Non-Affiliated Third Parties listed in II. D. 4 above, by IBA, unless authorized and requested by the Client in writing.
- D. Confidential Information may be collected from or disclosed to the Non-Affiliated Third Parties listed in II. D. 1, 2 and 3 above, by IBA, without additional authorization from the Client, but only for the purposes described in III. A above.

IV. Safety and Security of Protected Information

- A. IBA ensures the safety and security of all Protected Information with strict policies and practices.
- B. IBA discloses only that Protected Information which is minimally necessary for the purposes described in III. A above.
- C. IBA maintains Protected Information in fully secured and restricted hard copy and system files.
- D. IBA allows only fully authorized employees access to Protected Information, trained in the proper handling and disclosure of confidential and private information.
- E. A strict disciplinary process applies should an employee violate IBA's privacy policies and practices.
- F. Protected Information is never disclosed without the Client's prior authorization, other than as described in III. A above.
- G. Protected Information is never sold to an Affiliated or Non-Affiliated Third Party, for any reason.
- H. Prior to disclosing Protected Information to Non-Affiliated Third Parties for the purposes described in III. A above, IBA requires that third party to adopt and implement similar privacy policies and practices.

v. Rights and Responsibilities of Clients

- A. It is not necessary for a Client to respond to this notice, or to contact IBA in any manner, to ensure the privacy and confidentiality of his/her Protected Information. Protected Information is safe and secure as stated within this notice.
- B. IBA will provide an individual with a copy of this notice, as may be amended, at the time he/she first purchases a product or service from IBA, and at least annually thereafter or at the time of a revision. A Client may request a copy of this notice at any time as directed below.
- C. Clients may submit a written request to receive a copy of their Protected Information maintained by IBA, for a reasonable copying fee, except such information or records originating from a medical provider or its custodian, or relevant to a potential or pending legal claim against IBA. The Client's medical provider or attorney should instead be consulted. Written requests must be submitted as directed below.
- D. Clients may notify IBA of errors in the Protected Information maintained by IBA, or request restrictions on its use, disclosure or method of delivery, or revoke a prior authorization, or request an accounting of disclosures, by submitting a written request as directed below. Revisions and corrections are within IBA's discretion.
- E. A Client may file a complaint with IBA, the U.S. Department of Health and Human Services, or his/her state Department of Insurance, if his/her privacy rights are violated. The complaint should be stated in writing and submitted as directed below if addressed to IBA. A Client will not be penalized for filing a complaint.
- F. Clients may contact IBA with any questions, concerns, requests or inquiries regarding this notice or the Protected Information maintained by IBA, by writing to this address: Attn: Privacy Official, Insurance Benefit Administrators, PO Box 2943, Shawnee Mission, KS 66201-1343 (please include your full name, certificate number, date of birth and current address with your mailing). Or, please contact us at (844)215-3756.