

HIC Privacy Policy

Overview

The purpose of this policy is to provide guidelines for acceptable use and protection measures for information assets, their privacy, protection and accessibility. HIC expects all entities working in, on and with HIC assets to be familiar with this policy. Your signature will be required stating that you have received, reviewed and understand HIC's position on client Privacy.

Integrity

This policy has been designed to maintain the integrity of all of HIC's PHI Data as it pertains to our customers, 3rd party entities and minimum compliance standards set forth by our governing agencies and our Board of Directors and shareholders. HIC will maintain a zero tolerance enforcement of this policy.

Policy Objectives

HIC Inc defines information classifications based on the sensitivity, criticality, confidentiality/privacy requirements, and value of the information. All information assets, whether generated internally or externally, must be categorized into one of these information classifications: Restricted, Confidential, Internal Use Only, or Public. When information of various classifications is combined, the resulting collection of information or new information must be classified at the most restrictive level among the sources. This policy specifically sets forth HIC's approach to Privacy and Privacy right of our clients as they pertain to the information assets listed in the above classifications and further to the provisions outlined below and here-in.

Scope

HIC, Inc. and its affiliated entities and subsidiaries may be separate legal entities. However, they are under common ownership and control, and thus have organized as a single **Affiliated Covered Entity (ACE)** for the purposes of the HIPAA Privacy Rule. This status permits HIC, its affiliated entities, and subsidiaries to maintain a single *Notice of Privacy Practices*. This notice describes the health information practices of the HIC Inc, organization. All entities, sites and locations will follow the terms of this notice. In addition, these entities, sites and locations may share medical information with each other for treatment claims, payment and healthcare insurance operations as described in this policy. This mandatory policy applies to all employees, volunteers, interns, 3rd party contractors and vendors who maintain a working relationship with HIC Inc., and who are accessing information assets of any kind in conducting business with or on behalf of HIC Inc.

Data & Communication Domains Covered by this Policy

This policy covers all communication domains that are related to transferring information and data related to HIC clients, employees, vendors and 3rd party contractors. This policy covers web/internet, email, fax, chat applications, telephony communications, data transmission to the cloud and between machines.

Our Obligation to the Client/Customer

We value the privacy of our customer's medical information as an important part of our "customer first" pledge. We view the protection of client privacy as an essential component of our vision to be the *Trusted Leader in Providing quality healthcare insurance solutions* and our mission to serve our clients with dignity and respect. We strive to use only the minimum amount of client health information necessary for the purposes described in this Privacy Policy.

We collect information from clients and use it to provide them with quality solutions, and to comply with certain legal requirements. We are required by law to maintain the privacy of client health information, and to give clients this Notice of our legal duties, our privacy practices, and client rights. When we disclose information to other persons and companies to perform services for us, we will require them to protect client privacy. There are other laws we will follow that may provide additional protections, such as laws related to mental health, alcohol and other substance abuse, and communicable disease or other health conditions.

This Notice covers the following sites and people: all health care and/or insurance professionals authorized to enter information into client charts, all of our associates and on-site contractors, all departments and units within our facilities, all health care students, all health care delivery facilities and providers within the HIC ecosystem. Client doctor or healthcare provider may have different policies or notices about the health information that was created for use in their respective office, hospital or clinic.

How We May Use and Disclose Health Information

Treatment: We may use and disclose client health information to provide treatment or services, to coordinate or manage client health care, or for medical consultations or referrals. We may use and disclose client health information among doctors, nurses, technicians, medical students and other personnel who are involved in taking care of our clients at 3rd party facilities or with such persons outside our facilities. We may use or share information about clients to coordinate the different services they need, such as prescriptions, lab work and x-rays. We may disclose information about clients to people outside our organization who may be involved in client care beyond initial scope, such as family members, home health agencies, therapists, nursing homes, clergy, and others.

Payment: We may use and disclose client health information so that we can receive payment for the treatment and services that were provided and that are covered under our coverage policies. We may disclose information to third parties that help us process payments, such as billing companies, claims processing companies, and collection companies.

Healthcare Insurance Operations: We may use health information to evaluate the quality of services that the client received, or the performance of our staff in servicing the client. We may use health information to improve our performance or to find better ways to recommend care. We may use health information to grant medical staff privileges or to evaluate the competence of our contracted health care professionals. We may use health information to decide what additional services we should offer and whether new treatments are effective. We may disclose information to students and professionals for review and learning purposes. We may combine our health information with information from 3rd party health care facilities to compare costs and levels of care and see where we can make improvements and recommendations to network providers. We may use health information for business planning, or disclose it to attorneys, accountants, consultants and others in order to make sure we are complying with the law. We may remove health information that identifies clients so that others may use the de-identified information to study health care and health care delivery without learning identity of the client. We will not use or disclose genetic information for underwriting purposes.

Certain Marketing Activities: We may use client medical information to forward promotional gifts of nominal value, to communicate with clients about products, services and educational programs offered by HIC, to communicate with clients about case management and insurance policy coordination and to communicate with clients about treatment alternatives. We do not sell client health information to any third party for their marketing activities unless client signs an authorization allowing us to do this.

Health Information Exchanges: We may participate in health information exchanges to facilitate the secure exchange of client electronic health information between and among several health care providers or other health care entities for client treatment, payment, or other health care insurance policy purposes. This means we may

share information we obtain or create about clients with outside entities (such as hospitals, doctors offices, pharmacies, or other insurance companies) or we may receive information they create or obtain about clients (such as medication history, medical history, or insurance information) so each of us can provide better treatment and coordination of client health care services.

Research: We may use or disclose client health information for research that has been approved by one of our official research review boards, which has evaluated the research proposal and established standards to protect the privacy of client health information. We may use or disclose client health information to a researcher preparing to conduct a research project. In these cases, we will remove any and all PII so that there shall be no personally identifiable information associated to the health information being used in the research.

Required by Law, Legal Proceedings, Health Oversight Activities, and Law Enforcement: We will disclose client health information when we are required to do so by federal, state and other law. We will disclose client health information when ordered in a legal or administrative proceeding, such as a subpoena, discovery request, warrant, summons, or other lawful process. We may disclose health information to a law enforcement official to identify or locate suspects, fugitives, witnesses, victims of crime, or missing persons. We may disclose health information to a law enforcement official about a death we believe may be the result of criminal conduct. We may disclose health information to a health oversight agency for activities authorized by law, such as audits, investigations, inspections and licensure.

Specialized Government Functions: If client is in the military or a veteran, we will disclose client health information as required by command authorities. We may disclose health information to authorized federal officials for national security purposes, such as protecting the President of the United States or the conduct of authorized intelligence operations. We may disclose health information to make medical suitability determinations for Foreign Service if we are approached by these governing agencies with appropriate clearances and warrants for the information..

Workers Compensation: We may disclose client health information as required by applicable workers compensation and similar laws.

Client Written Authorization: Other uses and disclosures of health information not covered by this Policy, or the laws that govern us, will be made only with client written authorization. These include the sale of health information, use of health information for marketing purposes, and certain disclosures of psychotherapy notes. Client may revoke authorization in writing at any time, and we will discontinue future uses and disclosures of health information for the reasons covered by client's authorization. We are unable to take back any disclosures that were already made with client authorization, and we are required to retain the records of the coverages and care that our coverages covered on behalf of the client.

Client Privacy Rights Regarding Health Information

Right to Obtain a Copy of this Privacy Policy: We will post a copy of our current Privacy Policy in our facilities and on our website. A copy of our current Policy will be available at our reception areas or upon request.

Right to Breach Notification : Clients have the right under HIPAA, or as required by law, to be notified if there is a breach of your unsecured medical information. If requested, this notification may be provided to you electronically.

Right to Choose a Representative : Clients have the right to choose someone to act on their behalf. If, as a client, you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health information. We will make efforts to verify the person clients designate has this authority and can act for you before we take any action.

Right to Choose How You Receive Your Health Information: Clients have the right to request that we communicate with you in a certain way, such as by mail or fax, email, or at a certain location, such as a home address or post office box. We will try to honor your request if we reasonably can. Your request must be in writing, and it must specify how or where you wish to be contacted. To submit a request, please visit our privacy page on our website and fill out the information request form. Upon receipt of this form a HIC representative will contact you to verify your ID information prior to releasing any health related info.

Contact Person

If you believe your privacy rights have been violated, you may call or file a complaint in writing with the HIC Privacy Office or the Department of Health and Human Services. We will take no retaliatory action against you if you file a complaint about our privacy practices.

HIC Privacy Policy Supplement

As an HIC employee, I acknowledge and agree:

1. That I have read and understand the HIC Privacy Policy.
2. Any violations of this policy will result in corrective action up to and including immediate termination of employment.

I _____, have read and accept the terms and conditions of the HIC Mobile Device Policy listed above.

Employee Signature: _____

Date: _____