

NOTICE OF PRIVACY PRACTICES

To Group Health Insurance Sponsors



THIS NOTICE DESCRIBES HOW PERSONAL HEALTH INFORMATION AND PERSONALLY IDENTIFIABLE INFORMATION ABOUT THOSE INSURED UNDER GROUP HEALTH CARE COVERAGE OR INDIVIDUAL HEALTH CARE COVERAGE MAY BE USED AND DISCLOSED AND HOW THEY CAN GET ACCESS TO THIS INFORMATION.

PLEASE READ CAREFULLY.

Questions: If insured individuals have any questions about this notice, please contact:

Lisa R. Yanak
Privacy Officer
Insurance Strategy, Inc.
6368 Pearl Road
Cleveland, Ohio 44130
440-842-9922 / 800-788-8146

We understand that health information about insured individuals is personal. We are committed to protecting the personal health information and personally identifiable information that we maintain as part of the group or individual health care insurance coverage with which we assist you to obtain. We have set up policies and procedures to make sure that this health coverage information that identifies insured individuals is kept private.

This notice applies to all personal health information and personally identifiable information that Insurance Strategy, Inc. maintains. It will tell insured individuals about the ways that we may use and share personal health information and personally identifiable information about insured individuals. It describes our responsibilities for personal health information and personally identifiable information that we use. Also, this notice tells our clients about insured individuals' rights in relation to their personal health information and personally identifiable information.

**Insurance Strategy, Inc.'s Obligations
Regarding Personal Health Information
And Personally Identifiable Information**

Insurance Strategy, Inc. is required to make sure that we protect and safeguard an insured individual's personal health information and personally identifiable information that we maintain.

- We must give a group health insurance sponsor this notice that describes our legal duties and our privacy practices concerning insured individuals' personal health information and personally identifiable information.
- We must make reasonable efforts to release only the minimum personal health information and personally identifiable information necessary to accomplish the use, disclosure or request.
- By law, we must follow the terms of our privacy notice that is currently in effect.

Use and Disclosure of Personal Health Information and Personally Identifiable Information By Insurance Strategy, Inc.

This notice describes the personal health information and personally identifiable information practices of Insurance Strategy, Inc. in its role of an insurance broker of group health insurance coverage for insured individuals. It also describes the responsibilities and obligations placed on Insurance Strategy, Inc. by , a third party or insurance carrier that provides or assists in the administration of the health care insurance coverage that insured individuals have through their employer Insurance Strategy, Inc..

To provide insured individuals with group health care insurance coverage, it is necessary for Insurance Strategy, Inc. to plan to collect, store, use and share with others; personal health information and personally identifiable information about those for whom we help obtain health care insurance coverage.

Categories of Personal Health Information that We Use

Ordinary Business Practice It is our ordinary business practice to maintain only that personal health information and personally identifiable information about individuals who have health care insurance coverage that Insurance Strategy, Inc. helped obtain or whose employer has requested help in obtaining health insurance coverage. This following information is collected as part of our ordinary business practices:

- A list of those receiving employer sponsored health care insurance coverage from employers who have requested help in obtaining health care insurance coverage;
- Documentation of each employee's enrollment in or declination of coverage for himself / herself and eligible spouse and dependents;
- Any de-identified information from which personally identifiable information has been stripped by an insurance carrier and provided to an employer through Insurance Strategy, Inc. or by the employer;
- Copies of any applications from employees required by a carrier to obtain or quote on health care insurance coverage;
- Any information obtained as a result of a request from an employee for assistance from Insurance Strategy, Inc. with eligibility, coverage or claims issues.

The following categories give details about the times when we could have access to insured individuals' personal health information and personally identifiable information. Not every use or disclosure in a category will be listed, but all of the uses and disclosures permitted by law fall within the categories.

To Obtain and Manage Health Care Insurance Coverage The collection, use and sharing of personal health information and personally identifiable information is necessary to get health care insurance coverage for our employer clients and their eligible employees and dependents. For instance, we may use personal health information and personally identifiable information to: get premium quotes from insurance carriers or third party administrators or obtain information on premium underwriting; assist with submitting claims for stop-loss or excess loss coverage; obtain legal, accounting, and audit services; conduct business management and administrative activities related to the health care insurance coverage.

To Obtain Payment of Claims Insurance Strategy, Inc. may use and share insured individuals' personal health information and personally identifiable information to make payment possible for covered health care that insured individuals receive. This includes determining eligibility for coverage benefits and coordinating coverage with other health care plans. For instance, Insurance Strategy, Inc. may tell a health care provider about insured individuals' medical history to help decide if particular treatment is covered under the individual's group health plan.

To Comply with Laws and Government Authorities Insurance Strategy, Inc. will disclose insured individuals' personal health information and personally identifiable information when required by federal, state or local law, regulation, or court or government agency order. For example, as permitted or required by law, we must reveal

personal health information and personally identifiable information when: required to work with public officials to prevent or manage a serious threat to public health or safety; required for government monitoring of health care, civil rights laws, or other government oversight activities; ordered to do so by a court or other lawful process relating to a civil lawsuit or criminal matter; and directed by law enforcement officials, coroners, medical examiners, or national security officials in the lawful pursuit of their duties. If ordered by a court or other legal process to provide personal health information and personally identifiable information about insured individuals, Insurance Strategy, Inc. will make an effort to tell insured individuals about the request.

Insured individuals' Rights

Regarding Insured individuals' Personal Health Information and Personally Identifiable Information

An Insured individual, or a personal representative that insured individual designates, has the following rights regarding any of insured individual's personal health information and personally identifiable information that we may maintain.

If the information has been provided to a health insurance carrier, Insurance Strategy, Inc. may be required to follow the instructions of the health insurance carrier relating to any such amendment or change. (Bold entire sentence)

Right to Authorize Other Uses and Disclosures Other uses or disclosures of insured individual's personal health information and personally identifiable information not covered by this notice will be made only with insured individuals' written and signed permission or authorization.

If an insured individual gives written permission or authorization to disclose the insured individual's personal health information and personally identifiable information, the insured individual may revoke the authorization or remove the permission at any time. To revoke the authorization or remove the permission, the insured individual must tell us in writing. If we have released information before receiving an insured individual's request to revoke the authorization or remove permission, we will not be able to take that information back.

Right to Request Restriction on Certain Uses/Disclosures Insured individuals have the right to ask for a limitation or restriction on the personal health care information and personally identifiable information that we use and maintain for treatment, payment or health care operations. Insured individuals also have the right request a restriction or limitation on the information that we disclose to someone involved in insured individuals' care or payment for insured individuals' care. For example, an insured individual could ask that we not disclose a surgery that the insured individual had to a family member or a friend. The law says that we are not required to agree to an insured individual's request.

To ask for a restriction or limitation, insured individuals send a written request to:

Lisa R. Yanak
Privacy Officer
Insurance Strategy, Inc.
6368 Pearl Road
Cleveland, Ohio 44130
440-842-9922 / 800-788-8146

In insured individual's written request, the insured individual must tell us:

- What information insured individual want us to limit;
- Does the insured individual want us to limit our use, disclosure or both use and disclosure;
- To whom the insured individual wants the limits to apply, for example, the insured individual's spouse.

Right to Receive Confidential Communications Insured individuals have the right to ask us that we communicate with insured individuals about personal health care and personally identifiable information matters in a certain way. For instance, insured individuals can ask that we only contact insured individuals about personal health care matters at work, or only by mail.

To ask for confidential communications, insured individuals must send a written request to:

Lisa R. Yanak
Privacy Officer
Insurance Strategy, Inc.
6368 Pearl Road
Cleveland, Ohio 44130
440-842-9922 / 800-788-8146

Do not tell us the reason for insured individual's request. Insured individuals must tell us in the request how or where insured individuals wish to receive a communication that has personal health information and personally identifiable information. We will comply with any reasonable request.

Right to Inspect and Copy Personal Health Information and Personally Identifiable Information Insured individuals have the right to inspect and copy any of the insured individuals' personal health information and personally identifiable information that Insurance Strategy, Inc. maintains in relation to our group health coverage that is used for making health care decisions or claims payment. If insured individuals request a copy of this personal health information and personally identifiable information, we can charge a fee for the costs of copying, mailing or other supplies associated with insured individuals' request.

We may deny an insured individual's request to inspect and copy in certain very limited circumstances, as permitted by law. If we deny access to an insured individual's personal health information and personally identifiable information, the insured individual may request that the denial be reviewed.

To ask for an inspection or copy of an insured individual's personal health information and personally identifiable information, the insured individual must send a written request to:

Lisa R. Yanak
Privacy Officer
Insurance Strategy, Inc.
6368 Pearl Road
Cleveland, Ohio 44130
440-842-9922 / 800-788-8146

Right to Amend Personal Health Information and Personally Identifiable Information Insured individuals have the right to ask Insurance Strategy, Inc. to amend or change insured individuals' personal health information and personally identifiable information that we have if insured individuals believe that the information is incomplete or inaccurate.

To ask for a change in insured individual's personal health information and personally identifiable information that we have, the insured individual must send a written request to:

Lisa R. Yanak
Privacy Officer
Insurance Strategy, Inc.
6368 Pearl Road
Cleveland, Ohio 44130
440-842-9922 / 800-788-8146

We may deny an insured individual's request for any of the following reasons:

- It is not in writing;
- It does not contain a reason to support why insured individuals think that the information is incomplete or inaccurate;
- The information is not kept by Insurance Strategy, Inc.;
- The information was not created by Insurance Strategy, Inc., unless the person or entity that created the information is no longer available to make the change;
- The information is not part of the personal health information and personally identifiable information that insured individuals have a right to inspect or copy;
- The information is accurate and complete.

Right to Receive Accounting of Disclosures

Insured individuals have the right to receive a list or accounting of any non-incident disclosures of the personal health information and personally identifiable information we have about insured individuals that are not authorized by insured individuals, not permitted by law or regulation, or related to treatment, payment or group health plan operations. When we become aware of any disclosure not authorized by insured individuals or not permitted by law or regulation, we will inform insured individuals in writing.

Right to a Paper Copy of this Notice Insured individuals have the right to another paper copy of this notice. Insured individuals may ask the employer sponsoring their group health care coverage for it at any time.

Changes to This Notice

Insurance Strategy, Inc. reserves the right to change this notice and to make new notice provisions effective for all personal health information and personally identifiable information that it maintains or collects in the future. If we change this notice, we will send our employer group health clients a copy of the changed notice.

Complaints

If insured individuals believe that insured individual's privacy rights have been violated in relation to personal health information and personally identifiable information that Insurance Strategy, Inc. maintains or uses, insured individuals may file a complaint with Insurance Strategy, Inc. All complaints must be submitted in writing.

Insured individuals will not be penalized for filing a complaint.

To file a complaint with Insurance Strategy, Inc., contact:

Lisa R. Yanak
Privacy Officer
Insurance Strategy, Inc.
6368 Pearl Road
Cleveland, Ohio 44130
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If not satisfied with the outcome of Insurance Strategy, Inc.'s complaint process or, in addition to this process, a person who believes a covered entity is not complying with HIPAA Privacy requirements may file a complaint in writing with the Secretary of the U.S. Department of Health and Human Services.

Complaints to the Secretary must: (1) Be filed in writing, either on paper or electronically; (2) name the entity that is the subject of the complaint and describe the acts or omissions believed to be in violation of the HIPAA privacy law and regulations; and (3) be filed within 180 days of when the complainant knew or should have known that the act or omission complained of occurred, unless this time limit is waived by the Office for Civil Rights for good cause shown.

For complaints involving covered entities located in **Indiana, Michigan, or Ohio:**

Region V, Office for Civil Rights
U.S. Department of Health and Human Services
233 N. Michigan Ave., Suite 240
Chicago, Ill. 60601.
Voice Phone (312) 886-2359
FAX (312) 886-1807
TDD (312) 353-5693

For complaints involving covered entities located in **Kentucky:**

Region IV Office for Civil Rights
U.S. Department of Health and Human Services
Atlanta Federal Center, Suite 3B70
61 Forsyth Street, SW.,
Atlanta, GA 30303-8909
Voice Phone (404) 562-7886.
FAX (404) 562-7881
TDD (404) 331-2867