

ASR HEALTH BENEFITS PRIVACY POLICY FOR SELF-FUNDED GROUP PLANS

This policy explains how ASR collects nonpublic personal information, the type of information that we may collect, and what information we may disclose to other companies not affiliated with ASR.

Acquisition of Personal Information

We collect nonpublic personal information about the individual participants of group plans, which the employers/plan sponsors and health care providers afford us.

Categories of Information We Disclose

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. For example, we only disclose nonpublic personal information when it is a request or transaction from the employer/plan sponsor, where authorized by the participant, or where required by law.

Parties to Whom We Disclose Information

We only permit disclosure of nonpublic information to our employee who are working on clients' accounts and to unrelated third parties who need to know that information in order to assist us in providing services to clients.

Confidentiality and Security of Nonpublic Personal Information

We restrict access to nonpublic personal information to those individuals who need to know that information in order to provide services or products for the policy. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to secure nonpublic personal information.

NOTICE TO PLAN PARTICIPANTS

Notice of Privacy Practices Available

The U.S. Department of Health and Human Services has issued regulations as part of the Health Insurance Portability and Accountability Act of 1996. These regulations, known as the Standards for Privacy of Individually Identifiable Health Information, were effective on April 14, 2003 (or April 14, 2004 for small health plans) and control how your medical information may be used and disclosed and how you can access this information. Please be advised that your benefits plan maintains a current Notice of Privacy Practices to inform you of the policies that it has established to comply with the Standards for Privacy. This Notice describes the responsibilities of the plan and any third party assisting in the administration of claims regarding the use and disclosure of your protected health information, and your rights concerning the same.

This Notice is available to you upon request by contacting your company's Privacy Official or Human Resource Directory.