

Privacy
Policy

2017

Our clients' and potential clients' privacy and confidentiality are of the utmost importance to us. This document details the full explanation of how RetireMED®iQ protects all non-public information

Privacy
Practices and
Notices

RetireMED®iQ

Privacy Practices and Notices

In order to provide the best service possible for our clients and ensure compliance with all government regulations and essential carrier requirements, it is necessary for RetireMED®iQ (RMIQ) to collect personal information. Our clients' and potential clients' personal privacy and confidentiality are of the utmost importance to us. In servicing our clients, we obtain certain nonpublic personal information, such as information provided in applications, enrollment forms, scheduling requests, and customer support efforts, as well as information we may receive from insurance companies and other outside parties. This information may include individual health information such as past, present or future physical, mental or behavioral health conditions and diagnoses, as well as other personal data.

RMIQ does not disclose any personal information except as permitted or required by law. RMIQ requires all third parties involved in administering or providing services for RMIQ, its clients, potential clients, and partners to operate by these same guidelines.

RMIQ is committed to maintaining physical, electronic and procedural safeguards to ensure the protection and confidentiality of all nonpublic personal information. Employee access and use of this information is strictly limited to RMIQ business purposes. RMIQ regularly performs background checks on all employees and prospective employees. All RMIQ employees are required to fully accept all terms and conditions of the RMIQ Privacy Policy as a condition of employment. The RMIQ Compliance Team conducts ongoing training updates and communications for all employees in this regard.

HIPAA NOTICE: THIS PORTION OF THE NOTICE DESCRIBES HOW RMIQ PROTECTS MEDICAL INFORMATION

RetireMED®iQ (RMIQ) is required by law to maintain the privacy of protected health information and to provide individuals with notice of its legal duties and privacy practices with respect to protected health information. The purpose of this notice is to give you that information.

You are receiving this privacy notice because you are using RMIQ to help you select a Medicare Supplement, Medicare Advantage or Part D Prescription Drug plan. As a result, you may provide RMIQ protected health information.

In connection with providing consulting services to you, RMIQ may receive and maintain medical and other information about you. RMIQ may work with various insurance companies and other service providers to assist RMIQ. These insurance companies are called “covered entities” and the other service providers are called “business associates.” RMIQ requires that the “covered entities” and “business associates” agree to comply with the privacy laws regarding your protected health information.

HOW RetireMED®iQ USES YOUR PROTECTED HEALTH INFORMATION:

Disclosure required by law: RMIQ must disclose protected health information to law enforcement officials, as required by a legal proceeding, such as a court or administrative order or subpoena or is otherwise required, by statute, to disclose the protected health information

To Family Members: RMIQ may require a verbal or written authorization before disclosing protected health information to a spouse, parent or child in connection with inquiries about plan benefits and claims payment. RMIQ may disclose protected health information to a family member, friend or other person, for the purpose of helping you with your payment of your health care, if you are in a situation such as a medical emergency and you are not able to give or withhold consent for RMIQ to do this.

Other Uses: RMIQ may also use and disclose your medical information to “covered entities” and “business associates” to determine what coverage may best suit your needs and to process an application for coverage.

You Must Authorize Other Uses: RMIQ will not use or disclose your protected health information for any other purpose unless you give RMIQ written authorization to do so. If you give written authorization, it must state the specific use you are authorizing. In most cases you may revoke your authorization in writing at any time. Your revocation will not be effective to the extent that RMIQ has already taken action in reliance on your authorization. In no event will RMIQ sell your protected health information to any third party. Additionally, RMIQ will not use your protected health information for marketing purposes without your prior written consent.

Individual Rights to See and Amend and Other Rights Regarding Health Information:

The law gives you certain rights regarding your protected health information used or maintained by RMIQ as follows:

- You have the right to see and get copies of your protected health information, with limited exceptions. RMIQ reserves the right to impose a reasonable charge for repeat disclosures or

number disclosure requests within one year.

- You have the right to ask that RMIQ communicate with you in another way, to keep your protected health information confidential. You can ask RMIQ to communicate by a different means or at a different location than RMIQ normally uses. RMIQ does not have to agree to your request unless such confidential communications are necessary to avoid endangering you.
- You may request a correction to your protected health information. RMIQ will determine whether it is appropriate to correct your information in a particular circumstance.
- You may request an accounting of disclosures of your medical information by RMIQ for the last six years. This accounting will not include disclosures to you, disclosures pursuant to your authorization, or disclosures for disaster relief, national security or intelligence purposes.
- You may request a paper copy of this notice if you received this notice by e-mail or on the internet.

If you want to exercise any of the above rights, contact the Privacy Official of RMIQ as described below.

Complaints: You have the right to complain to RMIQ Privacy Official at the address listed at the end of this notice or to the Secretary of the U.S. Department of Health and Human Services if you believe that your rights regarding the privacy of your protected health information have been violated. You may file a complaint with RMIQ's Information and Complaint Official (below). You will not be retaliated against if you choose to file a complaint with RMIQ or with the U.S. Department of Health and Human Services.

You may also file a complaint with the Secretary of the U.S. Department of Health and Human Services. You may file the complaint electronically at the following website:

www.OCRMail@hhs.gov

You may file a written complaint. The address where you should mail the complaint is based upon where you reside. The following is a list of those addresses:

Region I – Boston (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont)

Peter Chan, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
Government Center
J.F.Kennedy Federal Building – Room 1875
Boston, MA 02203
Voice phone (800) 368-1019
FAX (617) 565-3809
TDD (800) 537-7697

Region II – New York (New Jersey, New York, Puerto Rico, Virgin Islands)

Linda Colon, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
Jacob Javits Federal Building
26 Federal Plaza – Suite 3312
New York, NY 10278
Voice Phone (800) 368-1019
FAX (212) 264-3039
TDD (800) 537-7697

Region III – Philadelphia (Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia)

Barbara Holland, Regional Manager
Office of Civil Rights
U.S. Department of Health and Human Services
150 S. Independence mall West
Suite 372, Public Ledger Building
Philadelphia, PA 19106-9111
Main Line (800) 368-1019
FAX (215) 861-4431
TDD (800) 537-7697

Region IV – Atlanta (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)

Roosevelt Freeman, Regional Manager

Office for Civil Rights
U.S. Department of Health and Human Services
Sam Nunn Atlanta Federal Center, Suite 16T70
61 Forsyth Street, S.W.
Atlanta, GA 30303-8909
Voice Phone (800) 368-1019
FAX (404) 562-7881
TDD (800) 537-7697

Region V – Chicago (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)

Celeste Davis, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
233 N. Michigan Ave., Suite 240
Chicago, IL 60601
Voice Phone (800) 368-1019
FAX (312) 866-1807
TDD (800) 537-7697

Region VI – Dallas (Arkansas, Louisiana, New Mexico, Oklahoma, Texas)

Jorge Lozano, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
1301 Young Street, Suite 1169
Dallas, TX 75202
Voice Phone (800) 368-1019
FAX (214) 767-0432
TDD (800) 537-7697

Region VII – Kansas City (Iowa, Kansas, Missouri, Nebraska)

Frank Campbell, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
601 East 12th Street – Room 353
Kansas City, MO 64106
Voice Phone (800) 368-1019
FAX (816) 426-3686
TDD (800) 537-7697

Region VIII – Denver (Colorado, Montana, North Dakota, Utah, Wyoming)

Velveta Howell, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
999 18th Street, Suite 417
Denver, CO 80202
Voice Phone (800) 368-1019
FAX (303) 844-2025
TDD (800) 537-7697

Region IX – San Francisco (American Samoa, Arizona, California, Guam, Hawaii, Nevada)

Michal Leoz, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
90 7th Street, Suite 4-100
San Francisco, CA 94103
Voice Phone (800) 368-1019
FAX (415) 437-8329
TDD (800) 537-7697

Region X – Seattle (Alaska, Idaho, Oregon, Washington)

Linda Yuu Connor, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
2201 Sixth Avenue – M/S: RX-11
Seattle, WA 98121-1831
Voice Phone (800) 368-1019
FAX (206) 615-2297
TDD (800) 537-7697

Interpretation: This portion of the notice is intended to comply with the privacy provisions of the Health Insurance Portability and Accountability Act (HIPAA). It is not intended to give individuals any greater rights than they have under HIPAA and it is not intended to give RMIQ, employers or business associates any greater obligations than they have under HIPAA, and it shall be interpreted accordingly.

SOCIAL SECURITY NUMBER PROTECTION: THIS PORTION OF THE NOTICE DESCRIBES HOW RMIQ PROTECTS SOCIAL SECURITY NUMBERS

It is RMIQ's policy to protect the confidentiality of Social Security Numbers (SSNs) that RMIQ receives or collects in the course of business. RMIQ will secure the confidentiality of SSNs through various means, including physical, electronic and administrative safeguards that are designed to protect against unauthorized access. It is RMIQ's policy to limit access to SSNs to which is lawful and to prohibit unlawful disclosure of SSNs.

GRAMM-LEACH-BAILEY ACT: THIS PORTION OF THE NOTICE DESCRIBES HOW RMIQ COMPLIES WITH THE GRAMM-LEACH-BAILEY ACT

The Gramm-Leach-Bailey Act (GLBA), generally prohibits RMIQ from sharing nonpublic personal information about you with a third party unless RMIQ provides you with this notice of RMIQ's privacy policies and practices describing the type of information that RMIQ collects about you and the categories of persons or entities to who that information may be disclosed. In compliance with the GLBA, RMIQ is providing you with this document, which notifies you of the privacy rules under GLBA and the information RMIQ collects:

- **Categories of Information Collected and Sources From Which RMIQ Collects It:** RMIQ collects nonpublic personal information about you and from your application forms and questionnaires you complete and return to RMIQ.
- **Persons From Whom Information is Collected:** RMIQ may collect nonpublic personal information from entities and individuals other than those seeking coverage.
- **Information RMIQ May Disclose to Third Parties:** In the course of RMIQ's general business practices, RMIQ may disclose the information that RMIQ collects (as described above) about you or others without your permission to various licensed insurance carriers.

WEBPAGE AND GENERAL E-MAIL COMMUNICATIONS: THIS PORTION OF THE NOTICE DESCRIBES HOW RMIQ USES WEBPAGE AND E-MAIL COMMUNICATIONS

RMIQ uses a number of physical security (such as locks and alarm systems), electronic security (such as passwords and encryption methods), and procedural security methods (such as rules regarding the handling and use of information), designed to protect the security and integrity of information submitted through the RMIQ website. However, due to the nature of the internet and on-line communications, RMIQ cannot guarantee that any information transmitted on-line will remain absolutely confidential, and we are not liable for the illegal acts of third parties such as criminal hackers.

Most e-mail, including any e-mail functionality on the RMIQ site, does not provide a completely secure and confidential means of communication. It is possible that your e-mail communication may be accessed or viewed inappropriately by another internet user while in transit to RMIQ. If you wish to keep your information completely private, you should not use e-mail.

RMIQ PRIVACY, INFORMATION, AND COMPLAINT OFFICIAL:

For more information about RMIQ's privacy practices or to take advantage of your rights as described in this notice, contact:

Kevin O'Bryan
RMIQ, Privacy Officer
9080 Springboro Pike Suite 100
Miamisburg, OH 45342
Telephone 877.222.1942

Effective Date of This Notice: This notice is effective April 1, 2014. RMIQ will comply with the provisions in this notice until it is changed. RMIQ reserves the right to change the provisions of this notice at any time. If RMIQ makes changes to this notice, RMIQ will send the changed notice to all participants covered by RMIQ at that time. RMIQ may make the changes that apply to all protected health information it maintains, even that obtained before the effective date of the new notice.