

Privacy Policy

Due to the way information about your personal health is managed and maintained we are required by law to provide this notice which describes how medical information about you may be used and disclosed and how you can get access to this information,

PLEASE REVIEW THIS INFORMATION CAREFULLY.

We are required by law to maintain the privacy of your health information and to provide you this detailed Notice of our legal duties and privacy practices relating to your health information. We are also required to abide by the terms of the notice that are currently in effect.

I. USES AND DISCLOSURES FOR TREATMENT, PAYMENT AND HEALTH CARE OPERATIONS

Following are the various ways in which we may use or disclose your health information for purposes of treatment, payment and health care operations.

For Treatment. We will use and disclose your health information in providing you with personal emergency response services (the “Services”) and coordinating your care and may disclose information to healthcare providers involved in your care. For example, we will contact your physician(s) and/or emergency response personnel to discuss your plan of care as needed.

For Payment. We may use and disclose your health information for billing and payment purposes. We may disclose your health information to your representative, or to an insurance or managed care company, Medicare, Medicaid or another third party payor. For example, we may contact Medicare or your health plan to confirm your coverage or to request prior approval for services that will be provided to you.

For Health Care Operations We may use your health information for health care operation purposes. We may also disclose your health information to another entity with which you have or had a relationship if that entity requests your information for certain of its health care operations or health care fraud and abuse detection or compliance activities. For example, health information of many subscribers may be combined and analyzed for purposes such as evaluating and improving quality of care and planning for services. Another example of a health care operation is recording subscriber calls to ensure quality assurance.

II. SPECIFIC USES AND DISCLOSURES OF YOUR HEALTH INFORMATION

Following are the various ways in which we are allowed to use or disclose your health information

Individuals Involved in Your Care or Payment for Your Care. As part of the Services provided, we may disclose health information about you to a family member, close personal friend or other person(s) you identify, including personal responders, who are involved in your care.

Emergencies. We may use or disclose your health information as necessary in emergency treatment situations.

As Required By Law. We may use or disclose your health information when required by law to do so.

Business Associates. We may disclose your protected health information to a contractor or business associate who needs the information to perform the Services. Our business associates are committed to preserving the confidentiality of this information.

Data Breach Notification Purposes. We may use your contact information to provide legally-required notices of unauthorized acquisition, access, or disclosure of your health information. We may send notice directly to you or provide notice to the sponsor of your plan through which you receive coverage, if applicable.

Public Health Activities. We may disclose your health information for public health activities. These activities may include, for example, reporting to a public health authority for preventing or controlling disease, injury or disability; reporting abuse or neglect or reporting births and deaths.

Reporting Victims of Abuse, Neglect or Domestic Violence. If we believe that you have been a victim of abuse, neglect, domestic or other type violence, we may use and disclose your health information to notify a government authority, if authorized by law or if you agree to the report.

Health Oversight Activities. We may disclose your health information to a health oversight agency for activities authorized by law, such as audits, investigations, inspections and licensure actions or for activities involving government oversight of the health care system.

To Avert a Serious Threat to Health or Safety. When necessary to prevent a serious threat to your health or safety or the health or safety of the public or another person, we may use or disclose health information, limiting disclosures to someone able to help lessen or prevent the threatened harm.

Judicial and Administrative Proceedings. We may disclose your health information in response to a court or administrative order. We also may disclose information in response to a subpoena, discovery request, or other lawful process; efforts must be made to contact you about the request or to obtain an order or agreement protecting the information.

Law Enforcement. We may disclose your health information for certain law enforcement purposes, including, for example, to comply with reporting requirements; to comply with a court order, warrant, or similar legal process; or to answer certain requests for information concerning crimes.

Research. We may use or disclose your health information for research purposes if the privacy aspects of the research have been reviewed and approved, occurs after your death, or if you authorize the use or disclosure.

Coroners, Medical Examiners, Funeral Directors, Organ Procurement Organizations. We may release your health information to a coroner, medical examiner, funeral director or, if you are an organ donor, to an organization involved in the donation of organs and tissue.

Disaster Relief. We may disclose health information about you to assist in disaster relief efforts.

Military, Veterans and other Specific Government Functions. If you are a member of the armed forces, we may use and disclose your health information as required by military command authorities. We may disclose health information for national security purposes or as needed to protect the President of the United States or certain other officials or to conduct certain special investigations.

Workers' Compensation. We may use or disclose your health information to comply with laws relating to workers' compensation or similar programs.

Inmates/Law Enforcement Custody. If you are under the custody of a law enforcement official or a correctional institution, we may disclose your health information to the institution or official for certain purposes including the health and safety of you and others.

Health-Related Benefits and Services. We may use or disclose your health information to inform you about health-related benefits and services that may be of interest to you.

Additional Restrictions on Use and Disclosure. Certain federal and state laws may require special privacy protections that restrict the use and disclosure of certain health information, including highly confidential information about you. "Highly confidential information" may include confidential information under Federal laws governing alcohol and drug abuse

information and genetic information as well as state laws that often protect the following types of information:

1. HIV/AIDS;
2. Mental health;
3. Genetic tests;
4. Alcohol and drug abuse;
5. Sexually transmitted diseases and reproductive health information; and
6. Child or adult abuse or neglect, including sexual assault.

If a use or disclosure of health information described above in this notice is prohibited or materially limited by other laws that apply to us, it is our intent to meet the requirements of the more stringent law. Attached to this notice is a Summary of Federal and State Laws.

III. USES AND DISCLOSURES WITH YOUR AUTHORIZATION

Except as described in this Notice, we will use and disclose your health information **only with your written authorization**. Once you give us authorization to release your health information, we cannot guarantee that the person to whom the information is provided will not disclose the information. You may take back or "revoke" your written authorization at anytime in writing. If you revoke an authorization, we will no longer use or disclose your health information for the purposes covered by that authorization, except if we have already released information prior to our receipt of your revocation

IV. YOUR RIGHTS REGARDING YOUR HEALTH INFORMATION

You do have rights regarding your health information and each of these rights is subject to certain requirements, limitations and exceptions. Exercise of these rights may require submitting a written request to Connect Amierca. At your request, Connect America will supply you with the appropriate form to complete. Following is a list of your rights:

Request Restrictions. You have the right to request restrictions on our use or disclosure of your health information for treatment, payment, or health care operations. You also have the right to request restrictions on the health information we disclose about you to a family member, friend or other person who is involved in your care or the payment for your care. All requests for restrictions are required to be in writing.

We are not required to agree to your requested restriction (except that if you are competent you may restrict disclosures to family members or friends). If we do agree to accept your requested restriction, we will comply with your request except as needed to provide you emergency treatment.

Access to Personal Health Information. You have the right to inspect and obtain a copy of your clinical or billing records or other written information that may be used to make decisions about your care. Your request may be made in writing or verbally. In some cases we may charge a reasonable fee for our costs in copying and mailing your requested information.

We may deny your request to inspect or receive copies in certain circumstances. If you are denied access to health information, in some cases you have a right to request review of the denial. A licensed health care professional designated by Connect America who did not participate in the decision to deny would perform this review.

Request Amendment. You have the right to request amendment of your health information maintained by Connect America for as long as the information is kept by or for Connect America. Your request may be made in writing or verbally, and must state the reason for the requested amendment.

We may deny your request for amendment if the information (a) was not created by Connect America unless the originator of the information is no longer available to act on your request; (b) is not part of the health information maintained by or for Connect America; (c) is not part of the information to which you have a right of access; or (d) is already accurate and complete, as determined by Connect America.

If we deny your request for amendment, we will give you a written denial including the reasons for the denial and the right to submit a written statement disagreeing with the denial.

Request an Accounting of Disclosures. You have the right to request an “accounting” of certain disclosures of your health information. This is a listing of disclosures made by Connect America or by others on our behalf, but does not include disclosures for treatment, payment and health care operations, disclosure made pursuant to your Authorization, and certain other exceptions.

To request an accounting of disclosures, you must submit a request in writing, stating a time period beginning after our Engagement letter with you, that is within six years from the date of your request. The first accounting provided within a 12-month period will be free; for further requests, we may charge you our costs.

Request a Paper Copy of This Notice. You have the right to obtain a paper copy of this Notice, even if you have agreed to receive this Notice electronically. You may request a copy of this Notice at any time.

Request Confidential Communications. You have the right to request that we communicate with you concerning your health matters in a certain manner. We will accommodate your

reasonable requests. All requests may be made in writing or verbally.

V. FOR FURTHER INFORMATION OR TO FILE A COMPLAINT

If you have any questions about this Notice or would like further information concerning your privacy rights, please contact us at our office by telephone at 1-877-897-5111 (toll free); by email at Privacyofficer@connectamerica.com ; or by U.S. mail at the address below:

Richard Brooks

Privacyofficer@connectamerica.com

Connect America

1 Belmont Avenue, 12th Floor

Bala Cynwyd, PA 19004

If you believe that your privacy rights have been violated, you may file a complaint in writing with Connect America or with the Office of Civil Rights in the U.S. Department of Health and Human Services. We cannot and will not retaliate against you if you file a complaint.

To file a complaint with Connect America, contact us at our offices at any of the above contacts.

VI. CHANGES TO THIS NOTICE

We reserve the right to change this Notice and to make the revised or new Notice provisions effective for all health information already received and maintained by Connect America as well as for all health information we receive in the future. We will provide a copy of the revised Notice upon request.

POL-12-0001 Rev 1.0 Connect America

Department of Health and Human Services (HHS)

“GINA”

The Genetic Information Nondiscrimination Act of 2008

Information for Researchers and Health Care Professionals

April 6, 2009

The information presented in this fact sheet is intended for general informational purposes only. While this fact sheet does not cover all of the specifics of GINA, it does provide an explanation of the statute to assist those involved in clinical research to understand the law and its prohibitions related to discrimination in health coverage and employment based on genetic information. The information should not be considered legal advice. In addition, some of the provisions discussed involve issues for which the rules have not yet been finalized, and this information is subject to revision based on publication of regulations.

What is GINA?

The Genetic Information Nondiscrimination Act of 2008 (P.L. 110-233, 122 Stat. 881)¹, also referred to as GINA, is a new Federal law that prohibits discrimination in health coverage and employment based on genetic information. The President signed the act into law on May 21, 2008. The section of the law relating to health coverage (Title I) generally will take effect between May 22, 2009, and May 21, 2010.² The sections relating to employment (Title II) will take effect on November 21, 2009. GINA requires regulations pertaining to both titles to be completed by May 2009.

How does the Federal law affect state laws?

GINA provides a baseline level of protection against genetic discrimination for all Americans. Many states already have laws that protect against genetic discrimination in health insurance and

employment situations. However, the degree of protection they provide varies widely, and while most provisions are less protective than GINA, some are more protective. All entities that are subject to GINA must, at a minimum, comply with all applicable GINA requirements, and may also need to comply with more protective State laws.

What will GINA do?

GINA generally will prohibit discrimination in health coverage and employment on the basis of genetic information. GINA, together with already existing nondiscrimination provisions of the Health Insurance Portability and Accountability Act, generally prohibits health insurers or health plan administrators from requesting or requiring genetic information of an individual or the individual's family members, or using it for decisions regarding coverage, rates, or preexisting conditions. The law also prohibits most employers from using genetic information for hiring, firing, or promotion decisions, and for any decisions regarding terms of employment.

The statute defines 'genetic information' as information about:

- an individual's genetic tests (including genetic tests done as part of a research study);
- genetic tests of the individual's family members (defined as dependents and up to and including 4th degree relatives);
- genetic tests of any fetus of an individual or family member who is a pregnant woman, and genetic tests of any embryo legally held by an individual or family member utilizing assisted reproductive technology;
- the manifestation of a disease or disorder in family members (family history);
- any request for, or receipt of, genetic services or participation in clinical research that includes genetic services (genetic testing, counseling, or education) by an individual or family member.

Genetic information does not include information about the sex or age of any individual.

The statute defines 'genetic test' as an analysis of human DNA, RNA, chromosomes, proteins, or metabolites that detects genotypes, mutations, or chromosomal changes.

The results of routine tests that do not measure DNA, RNA, or chromosomal changes, such as complete blood counts, cholesterol tests, and liver-function tests, are not protected under GINA. Also, under GINA, genetic tests do not include analyses of proteins or metabolites that are directly related to a manifested disease, disorder, or pathological condition that could reasonably be detected by a health care professional with appropriate training and expertise in the field of medicine involved.

How will the law be enforced and what are the penalties for violation of the law?

The law will be enforced by various Federal agencies. The Department of Labor, the Department of the Treasury, and the Department of Health and Human Services are responsible for Title I of GINA, and the Equal Employment Opportunity Commission (EEOC) is responsible for Title II of GINA. Remedies for violations include corrective action and monetary penalties. Under Title II of GINA, individuals may also have the right to pursue private litigation.

¹http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_public_laws&docid=f:publ233.110.pdf

²The effective date of the insurance provisions is not the same in all cases because for group health plans, Title I will take effect at the start of the “plan year” beginning one year after GINA’s enactment. Because some health plans do not designate their “plan years” to correspond to a calendar year, there will be variation among plans as to when Title I takes effect for the plans. However, for individual health insurers, GINA will take effect May 22, 2009.