



## **Privacy Policy**

### **Privacy Notice**

Welcome to the Benefit Communications Inc. (BCI) web site (Site). It is important for you to understand what information we collect and maintain about you when you visit the Site.

As part of the day to day business operations of BCI, a Tennessee corporation, we receive and maintain certain information regarding our clients and our clients' employees. BCI limits the collection of personal information to what is required for benefit administration or for underwriting purposes. Information received from the Site depends in part on what you do when transacting business on the Site. BCI respects the privacy of every individual who visits our Site. Therefore, we would like to define the types of information we receive and describe how it is maintained in this privacy policy ("Privacy Policy"). This policy refers only to the information collected and maintained from this Site.

Using the Site confirms your consent and agreement to our privacy policy, including collection, use, and disclosure of information by BCI to authorized parties, as described herein. Your visit to the Site and communication with us via this Site is subject to this Privacy Policy, as well as our User Agreement or Terms of Service. If you do not agree with this privacy policy, you can choose to stop using the Site.

### **Disclosure of Non-Public Personal Information:**

BCI defines "personal information" as data that is unique to an individual, such as that individual's name, address, age, Social Security Number (or other identifier, such as driver's license or state identification number or employee identification number), e-mail address, or telephone number. We may request personal information from you to deliver requested materials to you, respond to your questions, or deliver a product or service to you. Any personal information that you may provide via the Site will be used solely for the purpose specified by your human resources or benefits department.

We restrict access to nonpublic personal information unless it is needed to complete a transaction that is authorized by your or your employer. Information is shared with your employer, providers and vendors (such as carriers, brokers, and wellness providers) that are authorized by your employer to assist in supplying products and services to you. Information is provided to nonaffiliated third parties as required by federal and state law. BCI maintains physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

### **Other Information Collected:**

BCI may ask for personal information (such as date of birth, social security number, name, address with zip code, telephone number and e-mail address) to verify appropriate Site usage. This information is collected from your employer (our client).

Through use of the website, we may collect information about your diagnosis and/or medical condition, treatment/medical history (including prescription medications), health insurance information, and/or financial or other relevant information, as necessary to submit coverage determination requests. The information we collect includes "Protected Health Information," as defined HIPAA.

As a normal course of business, BCI records phone conversations regarding your benefit enrollment choices. These voice recordings act as your electronic signature, and are subject to quality checking by our internal staff. A redacted copy of the recording may also be requested and provided to your employer's human resources or benefits department.



The Site may write and read “cookies” to your web browser. A cookie is an element of data that is stored temporarily or permanently on your computer and can be communicated between the Site and your browser. A cookie is not a computer program and has no ability to read data residing on your computer or instruct it to perform any function. We do not use cookies to store personal information about you.

We may also use “client-side page tagging”, which uses code on each page of the Site to write certain information about the page and the visitor to a log when a page is rendered to your browser. This technique is commonly used on commercial websites. “Tagging” does result in JavaScript or other client-side code to be run on your computer, but it is limited to providing information about the page from our Site that you are requesting and the configuration of your browser. It will not read any of the data files on your computer or execute other functions. It does not extract any personal information about you. You can prevent tagging by disabling JavaScript in your browser, but that may prevent you from using any or all the Site features.

**Children under 13:**

The Site is designed and directed to adults; it is not directed to children under the age of 13. We do not knowingly collect personal information from children, although we use and disclose children's personal information we have obtained voluntarily from you, your employer, or other third parties about the administration of your benefit programs. If you are under the age of 13, you are not permitted to submit information to this Site.

**Your Emails to Us:**

Please note that your email, like most non-encrypted Internet communications, may be accessed and viewed by others without your knowledge and permission while in transit to us. Therefore, please do not send e-mail to us with personal information. BCI has no way to secure personal information sent via e-mail. If you send us e-mail to ask a question, we will only use the information you provide to answer your request. Personal information will not be provided to a non-affiliated third party without your prior consent, except as permitted by federal and state law.

**Retention of Information Collected:**

The non-public personal information collected and maintained from the Site will be retained for seven years from the date of its creation or the date when it was last in effect, whichever is later; or longer, as required by law. Personal information is disposed of in a secure manner when no longer needed for the purpose for which it was obtained and used.

**Direct Access to Other Sites:**

BCI offers direct links to other separate and individual web sites that offer information, which could be beneficial to client employees. Since these direct links are separate web sites independent of the Site, they may not follow the same privacy guidelines set forth here. BCI assumes no responsibility or control over the acts or privacy policies of the third-party web sites to which BCI provides direct links. We suggest that you contact the appropriate controlling authorities of these sites or review their privacy policy.

**Correction/Updating Personal Information:**

If the personally identifiable information of a user of our services changes or an employer’s information changes, or if the user or employer no longer desires to use the services on this web site, BCI will endeavor to provide a way to correct, update or remove that user’s personal data. It is your responsibility to verify that your personal information is accurate. To correct or update personal information, contact your employer’s human resources or benefits department. Upon request and verification of identity, BCI will provide personal information collected during the benefits enrollment process.

**Inquiries, Complaints, or Disputes:**

For inquiries, complaints, or to dispute any information on this website, please contact your employer's human resources or benefits department. Upon request by your employer's human resources or benefits department, BCI will investigate and document any inquiries, complaints, or dispute of information. A report will be provided to your employer's human resources or benefits department. Any release of information in the report will be at the discretion of your employer's human resources or benefits department. Your employer may request an accounting of disclosures to third-parties.

**Security:**

BCI takes precautions to protect its users' personal non-public information. We implement various security measures in accordance with industry standards to protect the security of your personal information both on the Site, and off-line.

**Technical Security:** BCI uses SSL encryption to protect sensitive information online. When the registration/login form asks users to enter sensitive information, the information is encrypted and is protected with the encryption software. While on a secure page, such as the login page, the lock icon on the bottom of web browsers, such as Microsoft Internet Explorer and Mozilla Firefox, becomes locked, as opposed to unlocked, or open, when you are just "surfing".

**Administrative Security:** BCI protects user-information off-line and data at rest. Only BCI employees who need the information to perform their jobs are granted access to personally identifiable information. Furthermore, all BCI employees are kept up-to-date on BCI security and privacy practices.

**Physical Security:** The computers and servers that store personally identifiable information are kept in a secure environment.

If you have any questions about security at the Site, please submit your questions in writing to us at:

*Security Policy Administrator  
Benefit Communications Inc  
2977 Sidco Drive  
Nashville, Tennessee, 37212*

**Notification of Changes to Privacy Policy**

BCI reserves the right to change or update this Privacy Policy at any time. If we revise our Privacy Policy, we will post the revised policy here. As we may make changes at any time without notifying you, we suggest that you periodically consult this Privacy Policy. Please note that our rights to use your personal information will be based on the privacy policy in effect at the time you submit the personal information to us. This Privacy Policy is not intended to and does not create any contractual or other legal right in or obligation on behalf of any party.