

## **INSURANCE MANAGEMENT SERVICES NOTICE OF PRIVACY PRACTICES**

Insurance Management Services ("IMS") provides this notice to describe our privacy practices and our commitment to protecting the privacy and security of your personal and protected health information.

In order to effectively administer claims, provide quality customer service and other services on behalf of your group health plan, it is necessary for IMS to receive and or disclose personal and protected health information. IMS may disclose to employers, plan administrators, health care providers, other group health plans, insurers, service providers and/or business associates. Such information may be made available through enrollment forms, medical claims, medical reports, coverage history and other sources and forms necessary to effectuate claim administration, treatment, payment and health care operations.

The information IMS may receive and/or disclose may include your name, Social Security number, address, date of birth, telephone number, marital status, gender, dependent information, claim information and employment information. While this list is not all inclusive, it gives you an idea of the type of information we are referring to in this notice.

### **HIPAA Compliance**

The Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), in part, establishes new standards for healthcare privacy and security. IMS does receive protected health information ("PHI") from, and on behalf of, our customers that are subject to HIPAA. IMS is committed to protecting the privacy and security of personal and protected health information in a manner that is consistent with our customer's legal obligations. IMS has developed a privacy and security compliance program for our personnel that take into account HIPAA privacy and security standards and reasonable practices in the healthcare industry.

### **Our Security Procedures**

IMS understands that storing and transmitting data in a secure manner is essential. IMS stores your personal and protected health information using industry standard physical, technical and administrative safeguards to secure data against foreseeable risks, such as unauthorized use, access, disclosure, destruction and modification. Certain information containing personal and protected health information that is displayed or received via Internet Web browser technology is transmitted in a secured environment using 256-bit SSL encryption. You have a right to be notified if a breach of your unsecured PHI occurs.

### **Our Commitment to You**

- We will safeguard, according to strict standards of security and confidentiality, any information shared with us. We will limit the collection and use of information to the minimum required to provide superior quality customer service.
- We may disclose personal and protected health information to business associations of your group health plan.
- We may disclose personal and protected health information to service providers.
- We may disclose personal and protected health information reasonably necessary to assist in detecting or preventing criminal activity, fraud, misrepresentation or non-disclosure in a health benefit or insurance transaction/function.
- We may disclose personal and protected health information to another person or entity in order to administer your group health plan or for purposes of allowing the other person or entity to administer a health benefit plan including, but not limited to, payment and health care operations.
- We may disclose personal and protected health information to an insurance regulatory authority, to an insurance commissioner, law enforcement or other governmental authority as required or permitted by law.
- We may disclose personal and protected health information to comply with any law or legal process to which we are subject, including a facially valid administrative or judicial order, search warrant, subpoena or lawful discovery request.
- We may disclose personal and protected health information for the purpose of conducting an audit.
- We may disclose personal and protected health information to a professional peer review organization for the purpose of reviewing the service or conduct of a medical care institution or a medical care professional.
- We may disclose personal and protected health information to other non-affiliated third parties as permitted by law.
- We may disclose personal and protected health information not presently disclosed, but only as permitted by law.

In certain circumstances, IMS may be required by law to obtain from you separate, written authorization in order to disclose personal and protected health information, such as uses and disclosures of psychotherapy notes.

IMS will **never** sell or rent any of your personal information to third parties for marketing purposes and only share your personal information with third parties as described in this policy.

### **Revisions and Contact Information**

IMS reserves the right to amend this Privacy Policy. It may be revised from time-to-time as new features and services are added, as laws change and as the healthcare industry and privacy and security practices evolve.

For additional information about the IMS Privacy Policy, please contact us at 1-806-373-5944, or at IMS, Attention: Privacy Officer, PO Box 15688, Amarillo, Texas 79109.