

ConnectiCare's Privacy Notice

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.

PLEASE REVIEW IT CAREFULLY.

At ConnectiCare, protecting the privacy and confidentiality of your personal information is very important to us. In order to provide and administer benefits and services to you, we may collect, use, and disclose personal information. To help you better understand our commitment to protect the privacy and confidentiality of this information, we are providing you with this notice describing what types of information we collect, the measures we take to safeguard it, and the situations in which we might share that information. If you have questions about this notice or wish to exercise any of the rights outlined below, please call **Customer Service at the toll-free number on your ID card or 1-800-224-2273** for assistance.

INFORMATION WE COLLECT

ConnectiCare collects information that helps us administer your health benefits plan. Like all health care companies, we collect the following types of information about you and your dependents:

- Information we receive from you, your employer or benefits plan sponsor (for group health plans), medical provider or third parties, contained in applications, enrollment forms, surveys, health risk assessments, or other forms (e.g., name, address, social security number, date of birth, marital status, dependent information, payment information, medical history).*
- Information about your relationship and transactions with us, our affiliates, our agents, and others (e.g., claims, payment information, medical history, eligibility information, service inquiries, complaints, appeal and grievance information).

The information collected and stored by us is used for specific business purposes such as administering your benefit plan and complying with laws and regulations and the requirements of accreditation organizations.

* Information we collect through our Internet Web site is subject to ConnectiCare's Internet Privacy Policy, which is available on our Web site at **www.connecticare.com**.

HOW WE PROTECT YOUR INFORMATION

In accordance with applicable laws and our corporate policies, ConnectiCare has a responsibility to protect the privacy of your personal information. We maintain security standards and processes, including physical, electronic and procedural safeguards, to ensure that access to your non-public personal information is limited to authorized persons who need it to provide services and benefits to you. For example, all ConnectiCare employees are required to sign and abide by an Employee Confidentiality Agreement. Security measures such as using codes instead of names, restricted computer access, locked receptacles, and shredding information which is no longer needed or required to be retained by law, are just a few of the ways we protect your privacy.

WHO RECEIVES YOUR PERSONAL INFORMATION AND WHY

Upon enrolling in our benefit plans, you consent to our use and disclosure of personal information about you and your dependents necessary to administer your benefit plan and to provide services to you such as paying claims and providing health education programs. When necessary to facilitate the operation of our benefit plans, your receipt of medical treatment, or other related activities, we use your personal information internally, and disclose it to health care providers (doctors, pharmacies, hospitals and other caregivers), our affiliates, and those who help us to administer the benefit plans. We may also share it with other insurers, third party administrators, plan sponsors (under limited circumstances for group health plans to permit the plan sponsor to perform plan administration functions), health care provider organizations, and others who may be responsible for payment of the services or benefits you receive under your plan.

These parties are also required to keep confidential your personal information as provided by applicable laws. We do not otherwise disclose personal information about you except with your authorization or as otherwise permitted or required by law.

Here are some other examples of what we do with the information we collect and the reasons it might be disclosed to third parties:

- Plan and benefit administration purposes which may involve claims payment and medical management; medical necessity review; coordination of care, benefits, and other services; response to your inquiries or requests for services; building awareness about our products and programs; conducting grievance and appeals reviews; investigation of fraud and other unlawful conduct; auditing; underwriting and ratemaking; administration of reinsurance and excess or stop-loss insurance policies.
- Operation of preventive health, early detection and health education programs through which we, our affiliates, or contractors send educational materials and screening reminders to eligible members and providers. We may also use or disclose personal information to identify and contact members who may benefit from participation in specific disease or case management programs and send relevant information to those members (and their providers) that enroll in the programs.
- Quality assessment and improvement activities including accreditation organizations such as the National Committee for Quality Assurance (“NCQA”) and other independent organizations; performance measurement and outcomes assessment; health claims analysis and reporting, and health services research.
- Data and information systems management.
- Performing required regulatory compliance activities/reporting; responding to requests for information from regulatory authorities; responding to subpoenas or court orders; reporting suspected fraud or other criminal activity; conducting litigation or dispute resolution proceedings; and performing third party liability and related activities.
- Transitioning of policies or contracts from and to other insurers, HMOs or third party administrators; and facilitation of due diligence activities in connection with the purchase, sale or transfer of health benefits plans.
- To affiliated entities or nonaffiliated third parties who act on our behalf to provide plan administration services as permitted by law.

We require a written authorization prior to using or disclosing personal information for purposes not listed above (e.g., data requested for a workers' compensation or auto insurance claim, marketing/promotional activities). In the event that you are unable to give the required authorization (for example, if you are or become legally incompetent), we accept authorization from any person legally authorized to give authorization on your behalf. To revoke an authorization that you previously gave, you may send us a letter stating that you would like to revoke your authorization. Please provide your name, address, member identification number, the date the authorization was given, and a telephone number where you may be reached.

INDIVIDUAL RIGHTS FOR CONNECTICARE MEMBERS

As a ConnectiCare member, the following are your rights concerning your personal information. In order to exercise any of the rights outlined below, please call **Customer Service for assistance at the toll-free number on your ID card or 1-800-224-2273.**

How to Request Restrictions: You have the right to ask us to place restrictions on the way we use or disclose your personal information. However, we are not required to agree to a requested restriction.

How to Request Confidential Communications: We will accommodate reasonable requests to communicate with you about your personal information by alternative means or at alternative locations. We may ask you to make your request in writing.

How to Access Personal Information: If you want to access medical record information about yourself, or if you have a question regarding your care, you should go to the provider (e.g., doctor, pharmacy, hospital or other caregiver) that generated the original records. If you want to access the claims or other related information we maintain concerning you and your dependents, please contact Customer Service. In accordance with applicable law, we will permit you to obtain documents reflecting information we receive from your providers when they submit claims or encounters to us for payment. We reserve the right to charge you an administrative fee.

How to Request Amendment of Personal

Information: You have the right to request that we amend your personal information. If you believe the information in your medical records is wrong or incomplete, contact the provider who was responsible for the service or treatment in question. If we are the source of a confirmed error in our records concerning you, we will correct or amend the records we maintain. If we deny your request, we will provide you a written explanation. We are not able to correct the records created or maintained by your provider.

How to Request an Accounting of Disclosures of Personal Information:

You have the right to receive a list of instances in which we or our business associates disclosed your personal information for purposes other than treatment, payment, or health care operations. If you request this list more than once in a twelve-month period, we may charge you a reasonable cost-based fee for responding to these additional requests. You must submit this request in writing using ConnectiCare's request form. This form may be obtained by contacting Customer Service.

WHAT HAPPENS TO PERSONAL INFORMATION FOLLOWING TERMINATION

Even after you are no longer enrolled in any ConnectiCare plan, we may maintain your personal information as required to carry out plan administration purposes on your behalf as discussed above. However, the policies and procedures that safeguard that information against inappropriate use and disclosure apply regardless of the termination status.

DISTRIBUTION OF CONNECTICARE'S PRIVACY NOTICES

We send a privacy notice to our members upon enrollment, when our privacy practices are materially changed, when a member requests a copy, and annually upon renewal of the member's health plan.

VIOLATION OF PRIVACY RIGHTS

If you believe your privacy rights have been violated, you may complain to ConnectiCare, the Department of Insurance, or to the Secretary of the U.S. Department of Health and Human Services. To file a complaint with ConnectiCare, please follow the grievance and appeal procedures described in your plan documents or call **Customer Service at the toll free number on your ID card or 1-800-224-2273**. We will not take any action against you for filing a complaint.

WE MUST ABIDE BY THE TERMS OF THIS NOTICE. WE RESERVE THE RIGHT TO CHANGE THE TERMS OF THIS NOTICE AND TO MAKE THE PROVISIONS OF THE NEW NOTICE EFFECTIVE FOR ALL PERSONAL INFORMATION WE MAINTAIN.

This notice describes the privacy practices of ConnectiCare, Inc. and its affiliated companies: ConnectiCare Holding Company, Inc.; ConnectiCare of Massachusetts, Inc.; ConnectiCare of New York, Inc.; and ConnectiCare Insurance Company, Inc.

Additional rights may be available to members under applicable state law.

EFFECTIVE OCTOBER 1, 2007