

PIOPAC Fidelity

Third Party Administration

"Security, Integrity, Trust"

PRIVACY POLICY AND PROCEDURES

Protecting the privacy and confidentiality of information about our groups and participants is very important to PIOPAC Fidelity. Collectively, we strive to comply with each of the following policy and procedures:

- We do not sell, rent, lease or otherwise disclose personal information of our clients for purposes unrelated to our products and services. The personal information of our clients is of paramount importance to us. Therefore, we provide this information only to our employees, agents and health plan provider as required to allow them to help us develop and provide services.
- We work to ensure information integrity and security using technology tools and design our business practices to help protect the personal information of our clients is properly gathered, stored and processed.
- PIOPAC Fidelity has business policies and practices in place to help ensure that our employees carry out these practices to protect personal information about our clients. Employees are subject to censure, dismissal, or termination for violation of these policies.

PIOPAC Fidelity provides this notice to let you know about the current privacy practices. You do not need to do anything in response to this notice. This notice is merely to inform you about how we safeguard your information.

Collection of Information

As part of PIOPAC Fidelity's (PPF) normal operating procedures, PPF need to obtain information to determine an individual's eligibility for reimbursement claims and services. PPF may collect nonpublic personal health information about group and individual clients including:

- Information from clients and group including names, addresses, social security numbers and health information as required to process claims and reimbursements.
- Information about the clients' transactions with PIOPAC, agents or plan administrators regarding claims and payment information.
- Information from employer (including salary and benefits to determine eligibility information), clients' health care provider (including products and premium information), and family members.

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• Phone (808) 526-0097 • Toll Free (800) 777-0284 • Fax (808) 536-0430 •

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Disclosure of Information

PIOPAC Fidelity may disclose the nonpublic personal information we collect as described above, as well as information about your transactions with us (such as your policy coverage, premiums, and payment history) to our agents or health care provider who perform services or functions on our behalf. We may also disclose the nonpublic personal information we collect as authorized by you, or as required or permitted by law.

PIOPAC Fidelity will use or share with other parties any nonpublic personal health information about you for any purpose other than disclosures for the performance of insurance functions, claims, and reimbursements, or disclosures that are permitted or required by law, or disclosures that the client authorized.

PIOPAC Fidelity will not disclose any nonpublic personal information about a former client of PIOPAC Fidelity other than as may be required or permitted by law.

Confidentiality and Security

PIOPAC Fidelity will safeguard, according to strict standards of security and confidentiality, any information we collect, receive or maintain about our groups and clients. PIOPAC Fidelity maintains administrative, technical, and physical safeguards to ensure the security and confidentiality of our client's information and records, to protect against anticipated threats or hazards to such records, and to protect against unauthorized access to or use of such information or records.

Internally, PIOPAC Fidelity limits access to our clients' information to only those employees who need access to the information to perform their job functions. Employees who misuse information are subject to disciplinary actions. Externally, we do not disclose customer information to any third parties unless we have previously informed the customer of the disclosure, have been authorized to do so by the customer, or are required or permitted to make the disclosure by law.

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