

Notice of Online Privacy Statement

This Online Privacy Statement discloses the practices of West Virginia Family Health Plan, Inc. ("WVFH") regarding information gathering and disclosure from WVFH's website. This notice describes how medical and financial information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

WVFH is required to protect the privacy of your personal medical and non-public personal information. Also, WVFH is required to give you this notice about how WVFH uses or gives out ("discloses") medical and personal ("non-public") information held by WVFH. This protection extends to all forms of communication (oral, written, and electronic) of this information.

WVFH has engaged Highmark West Virginia and its subcontracts with third party vendors to administer this Website. References throughout this online privacy policy to "we," "us," or "our" refer to WVFH and its affiliates as the site owner. We want to assure Users of our Website (meaning any individual, including site visitors as well as those individuals who provide personal information via this Website, herein referred to as "User(s)") that their information is secure and maintained in confidence, consistent with applicable state and federal laws. Please read through the following pages, which describe our online privacy policy.

- 1. Collection of Information from Website Visitors** - WVFH may collect information regarding its website visitors and the computers they use, such as e-mail addresses, files downloaded, home server domain names, type of computer, search engine, operating system and web browser. WVFH may also collect information the visitor submits on-line when the visitor completes forms or surveys, sends e-mail messages or enters other data into website fields. In the event an e-mail is addressed to specific staff or is sent using the "Contact Us" option of this website, WVFH may retain the message. WVFH uses information and discloses it to third parties as permitted by law and to the least extent necessary.

WVFH's website and certain link sites use cookies to facilitate navigation. A cookie is a small piece of information about an Internet session that may be created when a person accesses a website. Cookies may contain a variety of information including the name of the website that issued them, what parts of the website the user accessed, passwords and user's name. Note that most web browsers can be modified by users to prevent cookies from being attached to the User.

How you use our Website will determine whether or not we need to collect information from you and how much information we collect. For many features, we do not require any information on who you are or ask questions about you, but for some of our features, we need to verify your identity through a login process.

- 2. Use of Information Collected Online** - Personal data collected by WVFH may be used by WVFH for many reasons, including analysis of how and when the website gets visited, for development of WVFH services or for changes in the content and appearance of this website. Aggregate data on visitors' home servers may be used for internal purposes or provided to third parties. Individually identifying information, such as names, postal and e-mail addresses, phone

numbers and other personal information that visitors voluntarily provide to WVFH may be added to WVFH's databases and/or used for future calls and mailings regarding website updates, new products and services, upcoming events, and for other purposes that comply with federal and state law.

WVFH may contact website visitors regarding membership issues, including specific issues affecting a member and general issues affecting groups of members, for example, changes to the Member Handbook, privacy statement, business practices or WVFH policies. Information may also be "cleansed" (stripped of any information which could identify you personally, such as your name or e-mail address), aggregated with other data, and used for general research, classification purposes, marketing, or other purposes without permission, but only in non-individually identifiable forms.

WVFH will use and give your medical information:

- To you or someone who acts for you (your personal representative)
- To the Department of Health and Human Services, if necessary, to make sure your privacy is protected
- When required by law
- To meet your medical needs, to pay for your healthcare and to operate the WVFH benefit program, for example:
 - To give information to doctors or other healthcare providers who care for you
 - To make sure you and other WVFH members get quality health care, to provide member services to you, or to resolve any complaints you have.
 - To pay or deny your claims or to share payments and payment information with your other insurer(s).

WVFH may also use or give your medical information:

- To state and federal agencies that have the legal right to receive such data
- For public health activities (such as reporting disease outbreaks)
- For government healthcare oversight activities (such as fraud investigations)
- For judicial and administrative proceedings (such as in response to a court order)
- For law enforcement purposes (such as providing limited information to locate a missing person)
- For research studies that meet all privacy law requirements (such as research related to the prevention of disease or disability)
- To avoid a serious and likely threat to health or safety
- To contact you about new or changed benefits
- To contact you for appointment reminders or for disease management programs and alternative treatments that may interest you
- To create a collection of information that can no longer be traced back to you

WVFH must have your written permission (an "authorization") to use or give out your medical information for any purpose that is not listed in this notice. You may take back ("revoke") your written permission at any time, except if WVFH already took action based on your permission.

- 3. Disclosure of Personal Data to Third Parties** - WVFH will not sell its member lists to anyone. Your e-mail address information may be used only for WVFH-related mailings and will not be given, sold or rented to any other party for any other use without your prior approval. Unless otherwise authorized by a visitor or validly requested by governmental authorities or legal process, WVFH will not distribute its members' specific information to outside persons or firms unless a disclosure is needed for the member's care, payment of members' claims or the necessary operations of the health plan.

WVFH may disclose to its affiliates and service providers that assist in meeting the needs of WVFH member's personal information of users that has been collected through its website, as permitted by law. Information collected by WVFH affiliates and service providers may also be shared with WVFH as permitted by law. Information disclosed by users on-line may be re-disclosed if needed to respond to the user's requests and inquiries. WVFH affiliates and service providers are required to follow no less than the privacy and confidentiality standards of law.

- 4. Links to Other Websites** - Our Website, and certain sites it provides links to, use cookies to facilitate easier navigation within the sites and to provide a higher level of convenience for Users, and for internal reporting and statistical purposes. While WVFH may provide links to other websites, a link on WVFH's website is not and should not be construed as an endorsement of the content, viewpoint, policies, products or services provided or advertised on the linked site. Once a visitor leaves the WVFH website by linking to a site not maintained by WVFH, the visitor should become familiar with the on-line privacy statement of the linked website before accessing or supplying information as the use of cookies by the linked site is subject to the company's own privacy policies.
- 5. Security Measures** - Although WVFH makes reasonable efforts to protect user information from unauthorized use or alteration, users should be aware that there is always some risk in sending information over the Internet. WVFH uses reasonable security features; however, the confidentiality of any communication or material transmitted to/from WVFH's website or e-mail cannot be guaranteed. WVFH only grants access to personal information to those employees, affiliates, service providers and other third parties as required by law, as required to provide healthcare products and services or as the user permits.

Certain employees may be provided with information regarding Users in order to respond to the individual's needs and provide requested information regarding specific services. Our employees are required, by written confidentiality statements, corporate policies, and state or federal laws or

regulations to maintain the confidentiality of personal information and to use strict standards of care in handling the information. Employees who do not conform to these confidentiality requirements are subject to disciplinary sanctions that may include dismissal.

Our affiliates are subject to our corporate policies regarding privacy and confidentiality and our Business Associates are legally bound by contract to employ at least the same strict standards of confidentiality as we employ. All employees, affiliates and third parties are subject to privacy policies, at least as restrictive as the policy described in this online document.

We maintain an internal privacy compliance program to ensure compliance with this privacy policy. This program includes oversight of the compliance program that creates, maintains, and enforces privacy procedures. Additionally, our compliance programs include on-going employee training, on-going maintenance and updating of security systems and practices and maintenance of customer feedback and complaint resolution process. We reserve the right to amend this policy at any time.

For private health matters, members of WVFH or their authorized representatives are encouraged to contact WVFH by telephone at the number listed on the member identification cards to discuss personal matters.

6. **Correction of Personal Data Collected On-Line** – Wherever possible, WVFH may provide website visitors with a summary of their personally identifiable information retained by WVFH from on-line sessions, upon request by mail, e-mail or phone. Website visitors may modify, correct, change or update personally identifiable information that WVFH has collected on-line by contacting WVFH via regular mail, e-mail or telephone. If you have questions about this online privacy policy, or concerns regarding your personal information, please send us your question by clicking Contact Us Tab on the Home Page and completing an Email Contact Form.
7. **Collection of Personal Data from Minors** - To the extent that WVFH is able to determine the age of website visitors by their submissions to or communications with WVFH, WVFH will not knowingly collect or post information from individuals under the age of fourteen without consent of a parent or guardian.

If registration is required on the WVFH website for offered services and a visitor submits information through the website that indicates the visitor is a minor, the minor's parent or guardian will be contacted regarding the registration. If the parent or guardian agrees, the registration processing will continue. If the parent or guardian indicates a desire to withdraw the registration, WVFH will provide instructions to the parent or guardian for deletion of the registration. No information collected through WVFH's website from users self-identified as minors will be used knowingly for any direct marketing or promotional purposes.

8. **Non-public information** - Non-public information is personal information but is non-medical, for example, the information you completed on your enrollment application that identifies who you are and how you can be contacted. Also, it is information collected for a request for services by

you or your doctor or information collected to answer a question or concern from you. WVFH does not give out your non-public information, except if required or permitted by law. WVFH does not give out your non-public information to anyone unrelated to providing your care under the health plan unless you or your representative gives permission. WVFH does not make your non-public information available to anyone other than those necessary to provide medical or health plan services to you. You have the right to give or withhold permission for other uses or disclosures of this information, except as required by law.

9. **Compliance Program** - WVFH's Compliance Program regarding privacy and security of user information includes oversight of privacy practices, training of employees and maintenance and updates to security systems. WVFH will investigate privacy and security complaints through its Compliance Officer.

10. **Changes to this Privacy Statement** - This On-Line Privacy Statement is subject to change at any time and should be reviewed by interested website visitors periodically. Questions or concerns regarding use of on-line information may be directed to WVFH by clicking "Contact Us" from the top of any of WVFH's web pages.

If you believe WVFH has violated your privacy rights as stated in this notice, you may file a complaint at the following address:

Privacy Officer - WVFH Health
Regulatory, Compliance and Legal Affairs
614 Market Street
Parkersburg, WV 26101

Filing a complaint will not affect your benefits. You may also file a complaint with the Secretary of the Department of Health and Human Services. For more information on filing a complaint or your rights stated in this notice, you may call WVFH's Member Services Department at 1-855-412-8001 (TTY users should call 711 or 1-800-982-8771). WVFH is required to follow the terms in this privacy notice. WVFH has the right to change the way your medical information is used and given out. If WVFH makes any changes, you will get a new notice by mail within sixty (60) days of the change. These privacy practices went into effect September 1, 2014.

Protecting your confidential information and PHI (protected health information) is a priority to us! We want you to know that we are committed to protecting all information, all the time. That includes protecting information provided in verbal, paper or in an electronic format.

We are happy to be your health insurance plan and we want you to know we care about you AND protecting your PHI and confidential information!