



## NOTICE OF PRIVACY PRACTICES

**This Notice is effective as of October 03, 2018.**

We know that you buy our products and services and use our website because you trust us. This notice explains how we protect your privacy and treat your personal information. It applies to current and former customers. Personal information means anything we know about you personally and includes personally identifiable information (PII) and protected health information (PHI). PHI is health and nonpublic personal financial information that can reasonably be used to identify you and that we maintain in the normal course of assisting in the administration of your employer's group health plan or providing you with insured health care coverage and other insurance services. Most information is collected from you in connection with the application and enrollment process for insurance coverage. For the purpose of this Notice, protected health information (PHI) includes your personally identifiable information (PII).

### **Protecting Your Information**

We understand the importance of, and are committed to, maintaining the privacy of your information. We take important steps to protect your PHI. We treat it as confidential. We take numerous steps to protect our systems from unauthorized access. We are required by applicable federal and state laws to maintain the privacy of your PHI. We are also required to provide you with this Notice which describes our privacy practices, our legal duties, and your rights concerning your PHI. We are required to follow the privacy practices that are described in this Notice while it is in effect. We comply with all laws that apply to us.

- Our employees are trained on our privacy and data protection policies and procedures;
- We use administrative, physical and technical safeguards to help maintain the privacy and security of your PHI;
- We have policies and procedures in place to restrict our employees use of your PHI to those employees who are authorized to access this information.
- Our corporate Compliance division monitors how we follow our privacy policies and procedures.

### **Collecting Your Information**

The types of Personal Information we collect and share depends on the product(s) or service(s) you have with us. We get your personal information mostly from you. We may also use outside sources to help ensure our records are correct and complete.

### **Using Your Information**

We do not make available to the general public any PHI you provide to us in connection with your insurance. We use industry standard technology and efforts to safeguard the confidentiality of your personal information.

We collect your personal information to help us decide if you're eligible for our products or services. We may also need it to verify identities to help deter fraud, money laundering, or other crimes. How we use this information depends on what products and services you have or want from us. It also depends on what laws apply to those products and services. For example, we may also use your information to:

- process claims and other transactions
- perform business research
- confirm or correct your information
- market new products to you
- help us run our business
- comply with applicable laws

We may share your personal information with your consent or as permitted or required by law. For example, we may share your information with businesses hired to carry out services for us. Other reasons we may share your information include:

- **As Permitted by Law:** We may use or disclose your PHI when we are permitted to do so by law.
- **For Process and Proceedings:** We may disclose your PHI in response to a court or administrative order, subpoena, discovery request, or other lawful process.
- **Criminal Activity or Law Enforcement:** We may disclose your PHI to a law enforcement official with regard to crime victims and criminal activities. We may disclose your PHI if we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health and safety of a person or the public. We may also disclose your PHI if it is necessary for law enforcement authorities to identify or apprehend an individual.
- **Special Government Functions:** When the appropriate conditions apply, we may use or disclose PHI of individuals who are Armed Forces personnel (i) for activities deemed necessary by appropriate military command authorities; (ii) for the purpose of determination by the Department of Veterans Affairs of your eligibility for benefits, or (iii) to foreign military authorities if you are a member of that foreign military service. We may also disclose your PHI to authorized federal officials for conducting national security and intelligence activities, including the provision of protective services to the President or others legally authorized to receive such governmental protection.
- **To Plan Sponsors, if applicable (including employers who act as Plan Sponsors):** We may disclose enrollment and disenrollment information to the plan sponsor of your group health plan. We may also disclose certain PHI to the plan sponsor to perform plan administration functions. We may disclose summary health information to the plan sponsor so that the plan sponsor may either obtain premium bids or decide whether to amend, modify or terminate your group health plan. Please see your plan documents, where applicable, for a full explanation of the limited uses and disclosures that the plan sponsor may make of your PHI in providing plan administration functions for your group health plan.
- **For Coroners, Funeral Directors, and Organ Donation:** We may disclose your PHI to a coroner or medical examiner for identification purposes, determining cause of death or for the coroner or medical examiner to perform other duties authorized by law. We may also disclose PHI to a funeral director, as authorized by law, in order to permit the funeral director to carry out his or her duties. We may disclose such information in reasonable anticipation of death. PHI may be used and disclosed for cadaveric organ, eye, or tissue donation purposes.
- **For Workers' Compensation:** We may disclose your PHI as permitted by workers' compensation and similar laws.

## **Cookies**

We may use cookies and log files to: (a) store information so that you will not have to re-enter it during your next visit to the website; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our services; and (d) monitor metrics such as total number of visitors and pages viewed.

## **Accessing and Correcting Your Information**

Individual Rights:

- **Access:** With limited exceptions, you have the right to inspect, or obtain copies of, your PHI. We may charge you a reasonable fee as permitted by law. We will provide you a copy of your PHI in the form and format requested, if it is readily producible in such form or format or, if not, in a readable hard copy form or such format as agreed to by you and us. You may request that we transmit the copy of your PHI directly to another person, provided your request is in writing, signed by you, and you clearly identify the designated person and where to send the copy of the PHI.
- **Amendment:** With limited exceptions, you have the right to request that we amend your PHI.
- **Confidential Communication:** You have the right to request that we communicate with you in confidence about your PHI at an alternative address.
- **Privacy Notice:** You have the right to request and receive a copy of this Notice at any time. For more information

or if you have questions about this Notice, please contact us using the information listed at the end of this Notice.

- **Breach:** You have the right to receive, and we are required to provide, written notification of a breach where your unsecured PHI has been accessed, used, acquired, or disclosed to an unauthorized person as a result of such breach, and which compromises the security or privacy of your PHI. Unless specified in writing by you to receive the notification by electronic mail, we will provide such written notification by first class mail or, if necessary, by such other substituted forms of communication permitted under the law.
- **Paper Copy:** You have the right to receive a paper copy of this Notice, upon request, even if you have previously agreed to receive the Notice electronically.

### **Questions**

We want you to understand how we protect your privacy. If you have any questions about this notice, please contact us. When you write, include your name, address, and policy or account number.

#### **Send privacy questions to:**

**The Cumming Group**

**Attention: Compliance**

**6405 Sheldon Road**

**Tampa, FL 33615**

**1-813-286-7650**

Please note that this Privacy Policy may change from time to time. If we make any material changes, we will notify you as required by law.