



Notice of Information Practices

THIS NOTICE* CONTAINS IMPORTANT INFORMATION ABOUT AETNA'S PRIVACY PRACTICES

PLEASE REVIEW IT CAREFULLY.

I. What is this notice?

To effectively administer our life and disability plans (collectively the "Benefits Plans"), Aetna† must collect and disclose nonpublic personal information. We consider this information private and confidential and have policies and procedures in place to protect the information against unlawful use and disclosure. This notice describes what types of information we collect, explains when and to whom we may disclose it, and provides you with additional important information. If you have questions about this notice, please call our toll-free customer service number:

Toll Free Number: 1-888-772-9682

II. What is "nonpublic personal information"?

Nonpublic personal information ("NPI") is information that identifies an individual enrolled in an Aetna Benefits Plan and relates to the person's participation in the Plan, the person's physical or mental health or condition, the provision of health care to that person, the person's employment, or payment of benefits to that person or the person's beneficiary. NPI does not include publicly available information, or information that is available or reported in a summarized or aggregate fashion but does not identify any individual person.

III. What types of personal information does Aetna collect?

Like all benefits companies, we collect the following types of information about you and your dependents and beneficiaries:

- ◆ Information we receive directly or indirectly from you, your employer or benefits plan sponsor, or previous benefits companies through applications, surveys, or other forms, in writing, in person, by telephone, or electronically (e.g., name, address, social security number, date of birth, marital status, dependent/beneficiary information, employment information, medical history).
- ◆ Information about your relationship and transactions with us, our affiliates, our agents, and others (e.g., underwriting and claims information, medical history, eligibility information, payment information, and service request, appeal and grievance information).
- ◆ Information we receive from consumer reporting agencies.

IV. How does Aetna protect this information?

At Aetna, we restrict access to NPI to those employees who need it to provide products or services to you and your dependents and beneficiaries. We maintain physical, electronic and procedural safeguards to protect NPI against unauthorized access and use. For example, access to our facilities is limited to authorized personnel and we protect information we maintain electronically through use of a variety of technical tools. We also have established a Privacy Office, which has overall responsibility for developing, implementing, educating company personnel about, and enforcing policies and procedures to safeguard NPI against inappropriate access, use and disclosure, consistent with applicable law.

V. What personal information does Aetna and other benefits plans use or disclose to third parties, and for what purposes?

We do not disclose NPI to anyone, except with member authorization (see Section VII) or otherwise as permitted by law. Disclosures permitted by law typically include those described in more detail below. When necessary for the operation of our Benefits Plans, or other related activities, we use NPI internally, share it with our affiliates, and disclose it to health care providers (doctors and other caregivers), other insurers, third party administrators, payors (employers who sponsor self-funded Benefits Plans and others who may be financially responsible for payment for the services or benefits you receive under your plan), vendors, consultants, government authorities, and their respective agents. These parties are required to keep NPI confidential as provided by applicable law. Here are some examples of what we do with the information we collect and the reasons it might be disclosed to third parties:

- ◆ Administration of life and disability benefits policies or contracts, which may involve claims payment and management; coordination of care, benefits, and other services; response to member inquiries or requests for services; building awareness about our products and programs; conduct of grievance and appeals programs; benefits and program analysis and reporting; fulfillment; risk management; detection and investigation of fraud and other unlawful conduct; auditing and quality assessment and improvement activities; underwriting and ratemaking; administration of reinsurance and excess or stop loss insurance policies and coordination with reinsurance and excess or stop loss insurers; and other activities described below.
- ◆ Operation of benefits programs in which we coordinate or blend the administration or case management of our disability plans with health or workers compensation benefit plans administered by Aetna or third parties.
- ◆ Performance measurement and outcomes assessment; claims analysis and reporting, and research.
- ◆ Data and information systems management.
- ◆ Performing mandatory regulatory compliance/reporting activities; responding to requests for information from regulatory authorities, responding to government agency or court subpoenas as required by law, reporting suspected or actual fraud or other criminal activity; conducting litigation, arbitration, or similar dispute resolution proceedings; and performing third-party liability (including administration of social security and workers compensation offsets), and related activities.

* This Notice is not a part of your Plan Documents (Group Policy, Certificate/Evidence of Coverage, Booklet, Group Agreement, Schedule of Benefits, Group Insurance Certificate). It is provided to you for informational purposes only.

† For purposes of this notice, "Aetna" refers to the Aetna Inc. family of companies, including those doing business as Aetna Life Insurance Company.

- ◆ Transfer of policies or contracts from and to other insurers or third party administrators; and facilitation of due diligence activities in connection with the purchase, sale or transfer of Benefits Plans.

In addition, we may disclose NPI to affiliated entities or nonaffiliated third parties as otherwise permitted by law. For other purposes, we seek special authorization before disclosing the information. In the event that a special authorization is required but the member in question is unable to give the authorization (for example, if the member is medically unable to do so), we will accept the authorization from any person legally permitted to give the authorization on behalf of the member.

VI. Why is it important that NPI be used and disclosed as described above?

We consider the activities described in Section V key for the administration of our group life and disability benefit plans. For example, target marketing helps us to better educate employees about the benefits available to them. Quality assessment and research programs help us to review and improve the services we provide. Coordinated or integrated disability and health benefit programs let us work more effectively with members to manage their disabilities and improve their health and productivity. Therefore, to the extent permitted by law, we use and disclose NPI as provided in Section V regardless of individual preferences. Of course, we recognize that many members do not want to receive unsolicited marketing materials unrelated to their Benefit Plans. Therefore, we seek special authorization before disclosing NPI for these marketing purposes.

VII. What does a person need to do to request other disclosures of personal information?

Many people ask us to disclose NPI to third parties or for reasons not described in Section V. For example, you may want us to make your records available to a neighbor who is helping you resolve a question about your claim. To authorize us to disclose any of your personal information to a person or organization or for reasons other than those described in Section V above, please call our toll-free customer service phone number listed in Section I to ask for a special authorization form. When you receive the form, fill it out and send it to us at the following address:

**HIPAA Member Rights Team
PO Box 14079
Lexington, KY 40512-4079**

If you fill out a form and later change your mind about the special authorization, send a letter to us at the same address, letting us know that you would like to revoke the special authorization. Please provide your name, address, member identification number or Social Security number, and a telephone number where we can reach you to confirm your request.

If you want to access information about yourself, you should go to the provider (e.g., doctor or other caregiver) that generated the original records, which are more complete than any we maintain. We do not have custody or control of your medical records. You may also request documents reflecting information we receive from your employer or providers when we process claims submitted to us for payment. In these cases, we may charge an administrative fee to help cover our costs, except where prohibited by law. In all other cases, we will refer you to the applicable employer or providers. To request claims/encounter information we maintain for you and your dependents, please call our toll free customer service phone number listed in Section I or send a letter to the HIPAA Member Rights Team at the address listed above and include the name, address, member ID or Social Security number, and date of birth of each person whose information you request. If you are requesting claims/encounter information for your adult dependents, each such adult dependent must co-sign the letter.

Where required by law, or if we are the source of a confirmed error in your records, we will correct or amend the records we maintain (but not the records maintained by your employer, provider or other third parties). If we do not agree that the records are incorrect, you can request we add a rebuttal statement to your file.

VIII. What does Aetna do with personal information about members who are no longer enrolled in an Aetna plan?

Aetna does not destroy NPI when individuals terminate their coverage with us. The information is necessary and used for many of the purposes described in Section V, even after an individual leaves a plan, and in many cases is subject to legal retention requirements. However, the policies and procedures that protect that information against inappropriate use and disclosure apply regardless of the status of any individual member.

IX. How is this notice distributed?

We plan to send this notice to our members upon enrollment in any of our full risk or insured Benefits Plans, when our confidentiality practices are materially changed, and at other times as required by law. We reserve the right to change the terms of this notice and to make the provisions of the new notice effective for all NPI we maintain. Updates of this notice can be requested by calling our toll-free customer service phone number listed in Section I, and also are available on our website, at www.aetna.com. A short version of this notice is included in many of our general marketing communications.

X. What should a person do if he or she believes this policy has been violated?

If you believe this policy has been violated with respect to information about you or your dependents or beneficiaries, please follow the grievance procedures described in your plan documents or call our toll-free customer service phone number listed in Section I.

XI. Other important information?

You have the right to know the reasons for an unfavorable underwriting decision. Previous unfavorable underwriting decisions may not be used as the basis for future underwriting decision unless we make an independent evaluation of the basic facts.

You have the right with very limited exceptions, not to be subjected to pretext interviews.¹

Coverage may be underwritten or administered by Aetna Life Insurance Company.

¹ We do not participate in pretext interviews.

Non-Discrimination Notice

Aetna complies with applicable Federal civil rights laws and does not discriminate, exclude or treat people differently based on their race, color, national origin, sex, age, or disability.

Aetna provides free aids/services to people with disabilities and to people who need language assistance. If you need a qualified interpreter, written information in other formats, translation or other services, call 1-888-772-9682.

If you believe we have failed to provide these services or otherwise discriminated based on a protected class noted above, you can also file a grievance with the Civil Rights Coordinator by contacting:

Civil Rights Coordinator, P.O. Box 14462, Lexington, KY 40512
1-800-648-7817, TTY: 711, Fax: 859-425-3379, CRCoordinator@aetna.com.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights Complaint Portal, available at <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or at: U.S. Department of Health and Human Services, 200 Independence Avenue SW., Room 509F, HHH Building, Washington, DC 20201, or at 1-800-368-1019, 800-537-7697 (TDD).

Availability of Language Assistance Services

TTY: 711

For language assistance in your language call 1-888-772-9682 at no cost. (English)

Para obtener asistencia lingüística en su idioma, llame sin cargo al 1-888-772-9682. (Spanish)

欲取得以您的語言提供的語言協助，請撥打1-888-772-9682，無需付費。(Chinese)

Pour une assistance linguistique dans votre langue, appeler le 1-888-772-9682 sans frais. (French)

Para sa tulong sa inyong wika, tumawag sa 1-888-772-9682 nang walang bayad. (Tagalog)

Hilfe oder Informationen in deutscher Sprache erhalten Sie kostenlos unter der Nummer 1-888-772-9682. (German)

للمساعدة اللغوية بلغتك الرجاء الاتصال على الرقم المجاني 1-888-772-9682. (Arabic)

Pou jwenn asistans nan lang pa w, rele nimewo 1-888-772-9682 gratis. (French Creole)

Per ricevere assistenza nella sua lingua, può chiamare gratuitamente il numero 1-888-772-9682. (Italian)

日本語で援助をご希望の方は 1-888-772-9682 (フリーダイヤル) までお電話ください。(Japanese)

본인의 언어로 통역 서비스를 받고 싶으시면 비용 부담 없이 1-888-772-9682번으로 전화해 주십시오. (Korean)

برای راهنمایی به زبان شما با شماره 1-888-772-9682 بدون هیچ هزینه ای تماس بگیرید. (Persian)

Aby uzyskać pomoc w swoim języku, zadzwoń bezpłatnie pod numer 1-888-772-9682. (Polish)

Para obter assistência no seu idioma, ligue gratuitamente para o 1-888-772-9682. (Portuguese)

Чтобы получить помощь с переводом на ваш язык, позвоните по бесплатному номеру 1-888-772-9682. (Russian)

Để được hỗ trợ ngôn ngữ bằng ngôn ngữ của bạn, hãy gọi miễn phí đến số 1-888-772-9682. (Vietnamese)

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