### **Our Continuing Commitment**

We will continue to provide this notice at the frequency required by law and will notify customers of any modification at least annually.

We will continue to follow the policies set forth in this notice even when a customer relationship no longer exists. However, that party will no longer be entitled to an annual notice.

**Privacy Policy** 

Lead Carrier Services Provided by:

Blue Cross Blue Shield of North Dakota
ATTN: CHAND Service Center
4510 13<sup>th</sup> Avenue South
Fargo, ND 58121
Phone Number: 1-844-363-8457



29306984 (0843)11-18

### **Privacy Policy**

Administrative services are provided to The Comprehensive Health Association of North Dakota (CHAND) through a Lead Carrier Agreement with Blue Cross Blue Shield of North Dakota. The Lead Carrier and its affiliated companies recognize that the cornerstone of our success is the trust and confidence of the people we serve. To provide you with the most effective and convenient access to our services, the Lead Carrier must maintain information about you. Keeping your information secure and private is one of our top priorities. This notice is to let you know how we collect information about you, the type of information we collect and what we may disclose to our affiliates and non-affiliated third parties. It also details the steps we take to protect non-public personal information.

- Collection of Personal Information
- Sharing and Use of Personal Information
- Protecting Personal Information
- Our Continuing Commitment

# **Collection of Personal Information**

We must collect a certain amount of information to provide customer service, offer new products or services, evaluate benefits and claims, administer our products, and fulfill legal and regulatory requirements. Specific language and examples may not apply to all customers, and the information we collect varies accordingly. Examples include:

- Information on your application and related forms, such as name, address, date of birth, Social Security number, gender, marital status, income.
- Information about your relationship with us, such as products or services purchased, account balances, payment history and claims history.

- Information provided by any state or federal agency, your employer, benefits plan sponsor or association regarding any group product you may have, such as name, address, Social Security number, age, income and marital status.
- Information from a consumer reporting agency, such as consumer's creditworthiness and credit history.
- Information from other sources, such as motor vehicle reports, medical information and demographic information.
- Information from visitors to our Web sites, such as that provided through online forms, site visit data and online information-collecting devices known as "cookies." Cookies enable the site to "remember" who you are so you can navigate the site more easily. They also permit you to access secured information and conduct secured transactions. We do not record personal or sensitive information in our cookies.

## **Sharing and Use of Personal Information**

While acknowledging the importance of protecting customer information, we may find it necessary in the course of conducting business to disclose any of the information we collect about you, as described above, in some or all of the following circumstances:

- Enrollment information may be shared with our affiliates and non-affiliate third parties for products that you have selected on the application form.
- Information may be shared with nonaffiliated third parties (as permitted by law) who are assisting us by performing services or functions on our behalf, such as agents, brokers, brokerage firms, insurance companies, administrators and service providers.

- Information may be shared with other financial service companies, such as banks, insurance companies and securities brokers or dealers, with whom we have written agreements.
- Information may be shared with nonaffiliated third parties as permitted or required by law, such as compliance with a subpoena, fraud prevention or compliance with an inquiry from a government agency or regulator.
- Personal health information will be shared only as stated in our Notice of Privacy Practices. We will not share medical information for marketing purposes.

### **Protecting Personal Information**

We are committed to uphold our pledge to maintain the security of our customers' personal information. To ensure such information is used only in the manner we have described in this policy, we have instituted the following safeguards:

- Employees are required to comply with our established privacy policies and procedures, which exist to protect the confidentiality of customer information. Any employee who violates our privacy policies will be subject to a disciplinary process.
- Employees access the information only on a business need-to-know basis, such as to pay benefits or claims, underwrite a policy, administer a plan or service a customer request.
- We use manual and electronic security procedures to maintain the confidentiality of the information we collect and to guard against its unauthorized access. Such methods include locked files, user authentication, encryption and firewall technology.