



STUDENT  
INSURANCE

SINCE 1950 CA License #0386216

# Privacy Policies

## Website Privacy Policy

### Introduction

We are very sensitive to privacy issues. The purpose of this Website Privacy Policy is to let you know how we handle the information we receive from you through this website. Portions of this website may describe additional privacy practices applicable to specific types of information or to information provided on specific Web pages.

This Website Privacy Policy does not apply to information collected through other means such as by telephone or in person, although that information may be protected by other privacy policies. This site is intended for a United States audience. If you access this site from outside the U.S., you acknowledge, agree, and consent that any information you provide, including any personal information, will be transferred to and processed by a computer server located within the U.S., and subject to U.S. laws and regulations. Further, if you access this site from outside the U.S., you acknowledge and agree that you are responsible for compliance with any applicable local or national laws, rules or regulations applicable to such use.

### Cookies and non-personal information

"Non-personal information" means information that does not permit us to specifically identify you by your full name or similar unique identifying information such as a social security number, member identification number, address or telephone number. The Company uses "cookie" technology and similar technology to gather non-personal information from our website visitors such as which pages are used and how often they are used, and to enable certain features on this website.

You may disable these cookies and similar items by adjusting your browser preferences on your computer at any time; however, this may limit your ability to take advantage of all the features on this website. Keep in mind that cookies are not used to collect any personal information and do not tell us who you are. Some examples of the way we use cookies include:

- Tracking resources and data accessed on the site.
- Recording general site statistics and activity.
- Assisting users experiencing website problems.
- Enabling certain functions and tools on this website.
- Tracking paths of visitors to this site and within this site.

We may also collect other forms of non-personal information such as what web browsers are used to read our website and what websites are referring traffic or linking to our website. Aggregate and de-identified data regarding website users is also considered non-personal information.

### With whom is non-personal information shared?

Because non-personal information does not identify who you are, we do not limit the ways we may use or share non-personal information. For example, we may share non-personal information with our affiliates, suppliers, employees and agents, other businesses, and the government.

## Personal information provided by you

"Personal information" means information that specifically identifies you as an individual, such as your full name, telephone number, e-mail address, postal address, or certain account numbers. As used in this Website Privacy Policy, personal information does not include any information protected under HIPAA, which would be protected as described in the HIPAA Notices of Privacy Practices of your health plans or physicians and other health care professionals.

This website may include web pages that give you the opportunity to provide us with personal information about yourself. You do not have to provide us with personal information if you do not want to; however, that may limit your ability to use certain functions of this website or to request certain services or information.

We may combine personal information that you provide us through this website with other personal information held by the Company, including with affiliates or our vendors. For example, if you have purchased a product or service from us, we may combine personal information you provide through this website with information regarding your receipt of the product or service.

We may use personal information for a number of purposes such as:

- To respond to an e-mail or particular request from you.
- To personalize the website for you.
- To process an application as requested by you.
- To provide you with information that we believe may be useful to you, such as information about health products or services provided by us or other businesses.
- To comply with applicable laws, regulations, and legal process.
- To protect someone's health, safety, or welfare.
- To protect our rights, the rights of affiliates or related third parties, or take appropriate legal action, such as to enforce our Terms of Use.
- To keep a record of our transactions and communications.
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law.

You understand and specifically agree that we may use personal information to contact you through any contact information you provide through this website, including any email address, telephone number, cell phone number, text message number, or fax number.

## With whom is personal information shared?

We will only share your personal information with third parties as outlined in this Website Privacy Policy (in its current or future form) and as otherwise permitted by law.

We share and give access to personal information to our employees and agents in the course of operating our businesses. For example, if you sent us an e-mail asking a question, we would provide your e-mail address to one of our employees or agents, along with your question, in order for that person to reply to your e-mail. We may share personal information with other affiliates or business units within the Company.

We may share and give access to personal information with other companies that we hire to perform services on our behalf or collaborate with. For example, we may hire an outside company to help us send and manage e-mail, and in that case we might provide the outside company with your e-mail address and certain other information in order for them to send you an e-mail message on our behalf. Similarly, we may hire outside companies to host or operate some of our websites and related computers and software applications.

However, if we share or give access to personal information to outside companies we require them to use the personal information only for limited purposes, such as for sending you the e-mail in the example above. If you believe we or any company associated with the Company has misused any of your information please contact us immediately and report such misuse. We may share personal information if all or part of the Company is sold, merged, dissolved, acquired, or in a similar transaction. We may share personal information in response to a court order, subpoena, search warrant, law or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting website visitors who violate our rules, or engage in behavior that is harmful to other visitors, or is illegal.

If you submit information or a posting to a chat room, bulletin board, or similar "chat" related portion of this website, the information you submit along with your screen name will be visible to all visitors, and such visitors may share with others. Therefore, please be thoughtful in what you write and understand that this information may become public.

## **Reviewing my information**

This website may permit you to view your visitor profile and related personal information. If this function is available, we will include a link on this website with a heading such as or similar wording. Clicking on the link will take you to a page through which you may review your visitor profile and related personal information.

## **Website and information security**

We use a number of physical security (such as locks and alarm systems), electronic security (such as passwords and encryption methods), and procedural security methods (such as rules regarding the handling and use of information), designed to protect the security and integrity of information submitted through this website. Due to the nature of the Internet and on-line communications, however, we cannot guarantee that any information transmitted on-line will remain absolutely confidential, and we are not liable for the illegal acts of third parties such as criminal hackers.

## **General e-mail communications**

Most e-mail, including any e-mail functionality on our site, does not provide a completely secure and confidential means of communication. It is possible that your e-mail communication may be accessed or viewed inappropriately by another Internet user while in transit to us. If you wish to keep your information completely private, you should not use e-mail. We may send e-mail communications to you regarding topics such as general health benefits, website updates, health conditions, and general health topics.

## **Other online communications**

The Company sends electronic newsletters, notification of account status, and other communications such as information marketing other products or services offered by us, or by our contracted vendors on a periodic basis to various individuals and organizations. To opt-out of any specific electronic communication you're receiving, click on the opt-out button associated with the specific communication.

## **Contact us**

To contact us regarding this Website Privacy Policy and our related privacy practices, please contact us at:

### **Student Insurance**

10801 National Boulevard, Suite 603  
Los Angeles, CA 90064

## **Effective date**

The Effective Date of this Privacy Policy is 2013.

## Changes to this Website Privacy Policy

We may change this Website Privacy Policy. If we do so such change will appear on this page of our website or in another location as indicated by us. It is your responsibility to review the Website Privacy Policy each time you use this website. By continuing to use this website, you consent to any changes to our Website Privacy Policy.

## MEDICAL INFORMATION PRIVACY NOTICE

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

### Effective January 1, 2013

We are required by law to protect the privacy of your health information. We are also required to send you this notice, which explains how we may use information about you and when we can give out or "disclose" that information to others. You also have rights regarding your health information that are described in this notice. We are required by law to abide by the terms of this notice.

The terms "information" or "health information" in this notice include any information we maintain that reasonably can be used to identify you and that relates to your physical or mental health condition, the provision of health care to you, or the payment for such health care.

We have the right to change our privacy practices and the terms of this notice. If we make a material change to our privacy practices, we will provide to you a revised notice by direct mail or electronically as permitted by applicable law. In all cases, we will post the revised notice on your health plan website, such as [www.studentinsuranceusa.com](http://www.studentinsuranceusa.com). We reserve the right to make any revised or changed notice effective for information we already have and for information that we receive in the future.

## How We Use or Disclose Information

**We must** use and disclose your health information to provide that information:

- To you or someone who has the legal right to act for you (your personal representative) in order to administer your rights as described in this notice; and
- To the Secretary of the Department of Health and Human Services, if necessary, to make sure your privacy is protected.

**We have the right to** use and disclose health information for your treatment, to pay for your health care and to operate our business. For example, we may use or disclose your health information:

- **For Payment** of premiums due us, to determine your coverage, and to process claims for health care services you receive, including for subrogation or coordination of other benefits you may have. For example, we may tell a doctor whether you are eligible for coverage and what percentage of the bill may be covered.
- **For Treatment.** We may use or disclose health information to aid in your treatment or the coordination of your care. For example, we may disclose information to your physicians or hospitals to help them provide medical care to you.
- **For Health Care Operations.** We may use or disclose health information as necessary to operate and manage our business activities related to providing and managing your health care coverage. For example, we might talk to your physician to suggest a disease management or wellness program that could help improve your health or we may analyze data to determine how we can improve our services.

- **To Provide You Information on Health Related Programs or Products** such as alternative medical treatments and programs or about health-related products and services, subject to limits imposed by law.
- **For Plan Sponsors.** If your coverage is through a plan sponsor group health plan, we may share summary health information and enrollment and disenrollment information with the plan sponsor. In addition, we may share other health information with the plan sponsor for plan administration if the plan sponsor agrees to special restrictions on its use and disclosure of the information in accordance with federal law.
- **For Reminders.** We may use or disclose health information to send you reminders about your benefits or care, such as appointment reminders with providers who provide medical care to you.

**We may** use or disclose your health information for the following purposes under limited circumstances:

- **As Required by Law.** We may disclose information when required to do so by law.
- **To Persons Involved With Your Care.** We may use or disclose your health information to a person involved in your care or who helps pay for your care, such as a family member, when you are incapacitated or in an emergency, or when you agree or fail to object when given the opportunity. If you are unavailable or unable to object, we will use our best judgment to decide if the disclosure is in your best interests.
- **For Public Health Activities** such as reporting or preventing disease outbreaks.
- **For Reporting Victims of Abuse, Neglect or Domestic Violence** to government authorities that are authorized by law to receive such information, including a social service or protective service agency.
- **For Health Oversight Activities** to a health oversight agency for activities authorized by law, such as licensure, governmental audits and fraud and abuse investigations.
- **For Judicial or Administrative Proceedings** such as in response to a court order, search warrant or subpoena.
- **For Law Enforcement Purposes.** We may disclose your health information to a law enforcement official for purposes such as providing limited information to locate a missing person or report a crime.
- **To Avoid a Serious Threat to Health or Safety** to you, another person, or the public, by, for example, disclosing information to public health agencies or law enforcement authorities, or in the event of an emergency or natural disaster.
- **For Research Purposes** such as research related to the evaluation of certain treatments or the prevention of disease or disability, if the research study meets privacy law requirements.
- **To Provide Information Regarding Decedents.** We may disclose information to a coroner or medical examiner to identify a deceased person, determine a cause of death, or as authorized by law. We may also disclose information to funeral directors as necessary to carry out their duties.
- **For Organ Procurement Purposes.** We may use or disclose information to entities that handle procurement, banking or transplantation of organs, eyes or tissue to facilitate donation and transplantation.
- **To Correctional Institutions or Law Enforcement Officials** if you are an inmate of a correctional institution or under the custody of a law enforcement official, but only if necessary (1) for the institution to provide you with health care; (2) to protect your health and safety or the health and safety of others; or (3) for the safety and security of the correctional institution.
- **To Business Associates** that perform functions on our behalf or provide us with services if the information is necessary for such functions or services. Our business associates are required, under contract with us, to protect the privacy of your information and are not allowed to use or disclose any information other than as specified in our contract.
- **For Data Breach Notification Purposes.** We may use your contact information to provide legally-required notices of unauthorized acquisition, access, or disclosure of your health information. We may send notice directly to you or provide notice to the sponsor of your plan through which you receive coverage.
- **Additional Restrictions on Use and Disclosure.** Certain federal and state laws may require special privacy protections that restrict the use and disclosure of certain health information, including highly confidential information about you. "Highly confidential information" may include confidential information under Federal laws governing alcohol and drug abuse information and genetic information as well as state laws that often protect the following types of information:

1. HIV/AIDS;
2. Mental health;
3. Genetic tests;

4. Alcohol and drug abuse;
5. Sexually transmitted diseases and reproductive health information; and
6. Child or adult abuse or neglect, including sexual assault.

If a use or disclosure of health information described above in this notice is prohibited or materially limited by other laws that apply to us, it is our intent to meet the requirements of the more stringent law.

Except for uses and disclosures described and limited as set forth in this notice, we will use and disclose your health information only with a written authorization from you. Once you give us authorization to release your health information, we cannot guarantee that the person to whom the information is provided will not disclose the information. You may take back or "revoke" your written authorization at anytime in writing, except if we have already acted based on your authorization. To find out where to mail your written authorization and how to revoke an authorization, contact us at:

#### **Student Insurance**

10801 National Boulevard, Suite 603  
Los Angeles, CA 90064

## **What Are Your Rights?**

The following are your rights with respect to your health information:

- **You have the right to ask to restrict** uses or disclosures of your information for treatment, payment, or health care operations. You also have the right to ask to restrict disclosures to family members or to others who are involved in your health care or payment for your health care. We may also have policies on dependent access that authorize your dependents to request certain restrictions. **Please note that while we will try to honor your request and will permit requests consistent with our policies, we are not required to agree to any restriction.**
- **You have the right to ask to receive confidential communications** of information in a different manner or at a different place (for example, by sending information to a P.O. Box instead of your home address). We will accommodate reasonable requests where a disclosure of all or part of your health information otherwise could endanger you. We will accept verbal requests to receive confidential communications, but requests to modify or cancel a previous confidential communication request must be made in writing. Mail your request to the address listed below.
- **You have the right to see and obtain a copy** of health information that may be used to make decisions about you such as claims and case or medical management records. You also may in some cases receive a summary of this health information. You must make a written request to inspect and copy your health information. Mail your request to the address listed below. In certain limited circumstances, we may deny your request to inspect and copy your health information. We may charge a reasonable fee for any copies. If we deny your request, you have the right to have the denial reviewed. If we maintain an electronic health record containing your health information, when and if we are required by law, you will have the right to request that we send a copy of your health information in an electronic format to you or to a third party that you identify. We may charge a reasonable fee for sending the electronic copy of your health information.
- **You have the right to ask to amend** information we maintain about you if you believe the health information about you is wrong or incomplete. Your request must be in writing and provide the reasons for the requested amendment. Mail your request to the address listed below. If we deny your request, you may have a statement of your disagreement added to your health information.
- **You have the right to receive an accounting** of certain disclosures of your information made by us during the six years prior to your request. This accounting will not include disclosures of information made: (i) prior to April 14, 2003; (ii) for treatment, payment, and health care operations purposes; (iii) to you or pursuant to your authorization; and (iv) to correctional institutions or law enforcement officials; and (v) other disclosures for which federal law does not require us to provide an accounting.

- **You have the right to a paper copy of this notice.** You may ask for a copy of this notice at any time. Even if you have agreed to receive this notice electronically, you are still entitled to a paper copy of this notice. You also may also obtain a copy of this notice on [www.studentinsuranceusa.com](http://www.studentinsuranceusa.com).

## Exercising Your Rights

- **Contacting your Health Plan.** If you have any questions about this notice or want to exercise any of your rights, please email questions to [info@studentinsuranceusa.com](mailto:info@studentinsuranceusa.com).
- **Submitting a Written Request.** Mail to us your written requests for modifying or cancelling a confidential communication, for copies of your records, or for amendments to your record, at the following address:

### **Student Insurance**

10801 National Boulevard, Suite 603  
Los Angeles, CA 90064

- **Filing a Complaint.** If you believe your privacy rights have been violated, you may file a complaint with us at the address listed above.

**You may also notify the Secretary of the U.S. Department of Health and Human Services of your complaint.** We will not take any action against you for filing a complaint.

### **FINANCIAL INFORMATION PRIVACY NOTICE**

**THIS NOTICE DESCRIBES HOW FINANCIAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

Effective January 1, 2013

We are committed to maintaining the confidentiality of your personal financial information. For the purposes of this notice, "personal financial information" means information about an enrollee or an applicant for health care coverage that identifies the individual, is not generally publicly available, and is collected from the individual or is obtained in connection with providing health care coverage to the individual.

## Information We Collect

We collect personal financial information about you from the following sources:

- Information we receive from you on applications or other forms, such as name, address, age, medical information and Social Security number;
- Information about your transactions with us, our affiliates or others, such as premium payment and claims history; and
- Information from consumer reports.

## Disclosure of Information

We do not disclose personal financial information about our enrollees or former enrollees to any third party, except as required or permitted by law. For example, in the course of our general business practices, we may, as permitted by law, disclose any of the personal financial information that we collect about you, without your authorization, to the following types of institutions:

- To our corporate affiliates, which include financial service providers, such as other insurers, and non-financial companies, such as data processors;

- To nonaffiliated companies for our everyday business purposes, such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations; and
- To nonaffiliated companies that perform services for us, including sending promotional communications on our behalf.

## **Confidentiality and Security**

We restrict access to personal financial information about you to our employees and service providers who are involved in administering your health care coverage and providing services to you. We maintain physical, electronic and procedural safeguards in compliance with state and federal standards to guard your personal financial information. We conduct regular audits to help ensure appropriate and secure handling and processing of our enrollees' information.

### **Questions About this Notice**

If you have any questions about this notice, please email questions to [info@studentinsuranceusa.com](mailto:info@studentinsuranceusa.com).