



## Combined Life Insurance Company of New York

### It's about your Health Information. It's about you! Notice of Privacy Practices

#### 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 Date of Notice 04/14/03

Required by the privacy regulations issued under the  
Health Insurance Portability and Accountability Act of 1996 (HIPAA).

This notice describes how certain medical information about you may be used and disclosed ...  
as well as your rights regarding this information.

#### **A. Our Commitment To Your Privacy**

As a valued Combined customer, we are dedicated to maintaining the privacy of your health information. In conducting our business, we create and receive records regarding you and any services we provide to you. *By federal law\** we are required to maintain the confidentiality of any health information that identifies you. *This law and this notice only* apply to Medicare Supplement insurance, Long-Term Care insurance and certain supplemental hospital policies that primarily provide the exact payment amount required for the covered medical expenses you incur. You are receiving this notice because you have at least one of these insurance policies with Combined.

*By choice*, we are committed to retaining your trust and keeping your information personal and private.

\*The federal law mentioned above is the Health Insurance Portability and Accountability Act (HIPAA).

#### **B. How We May Use and Disclose Your Health Information**

**Your Authorization** — Except as outlined below, we will not use or disclose your health information unless you have signed a form authorizing such use or disclosure. At any time, you have the right to revoke in writing that authorization. However, under law, we may have the right to contest a claim under a policy or even the policy itself. As such, your revocation will not be allowed when either the issuance of the policy or a claim for benefits is involved. In addition, if Combined has taken action relying on your authorization, your ability to later revoke your authorization will be limited.

**1. For Your Treatment** — Combined may use or disclose your health information to others so that you may be treated or cared for by a medical provider. Your physicians, therapists, spouse, children and parents are examples of individuals to whom we may disclose your health information.

**2. For Payment Purposes** — For example, Combined may use or disclose your health information in order to pay you for health or medical services and items you may receive. Or, we may contact a doctor or hospital to certify the specifics of a treatment that was performed. We may also use or disclose your health information to a third party, such as a family member, who may be responsible for making or receiving payments on your behalf.

For the types of insurance coverages mentioned in the first paragraph, we are required by *this law* to provide you with this notice ... to explain our legal duties and privacy practices regarding your health information. You also have the right to request a copy of this notice at any time. Should any applicable law provide protections that are more favorable to protecting your privacy than the requirements of this federal law, we will use the more favorable law's requirements to protect your health information.

We are required to abide by the terms of this notice. However, we reserve the right to change our privacy practices at any time. If we do, we will send you a revised notice with the changes. Any changes to this notice would naturally be effective for all your health information.

**3. For Our Operations** — Combined may use and disclose your health information in order to operate our business, including the underwriting of an application. Examples: Our customer service representative may use or disclose your information in order to respond to your service request. Or, an auditor may review your health information as part of a routine quality check.

**4. To Assist You Or Others Responsible For Your Care** — At our option, Combined may use or disclose your health information in order to contact and remind you about health care appointments, doctor visits or perhaps deliveries. We may also choose to inform you about health related products or services that might be of interest to you.

If you are available and do not object, we may disclose information to a member of your family, a friend, or other person who is involved in your health care or the payment of a claim. If you are unavailable, incapacitated, or facing an emergency medical situation, and we determine that a limited disclosure is in your best interest, we may share limited information with such persons. For example, we may use our professional judgment to disclose your health information to your spouse concerning the processing of a claim.

We may also disclose information to a disaster relief organization in order for the organization to communicate with a family member or other person involved in your care.

HIPAA.2-NY-01/10

**5. Other Uses and Disclosures** — Unless otherwise prohibited by law, we may make certain other uses and disclosures of your health information without your authorization.

**We may use or disclose your health information:**

- to the extent required to comply with the law. For example, we may be required to disclose your health information to respond to a court order;
- to public health activities, such as reporting of disease, injury, birth, death, and for public health investigations;
- to the proper authorities as provided by law if we suspect child abuse or neglect or domestic violence, or if we believe you to be a victim of abuse, neglect, or domestic violence;
- if authorized by law to a government oversight agency (for example, a state insurance department) conducting audits, investigations, civil or criminal proceedings;
- in the course of a judicial or administrative proceeding (for example, in response to a subpoena or discovery request);
- to the proper authorities for law enforcement purposes;
- to coroners, medical examiners, or funeral directors, consistent with applicable law;
- for purposes associated with organ, eye or tissue donation or transplantation;
- for research purposes, but only as permitted by law;
- to avert a serious threat to health or safety;
- if you are a member of the military as required by armed forces services, and we may disclose your health information for other specialized governmental functions such as national security or intelligence activities;
- to workers' compensation agencies for your workers' compensation benefit determination;
- if required by law, disclose your health information to the Secretary of the Department of Health and Human Services for enforcement of federal law; and
- for any other purpose required by law.

**C. Your Rights To Your Health Information**

You certainly have rights regarding the health information we maintain about you. *Please read the following carefully so that you are fully aware of those rights.*

**1. You Can Request Confidential Communications From Us** — You can ask us to communicate with you in a particular manner or at a certain location. For example, you may ask that we communicate with you at work rather than at home. Or that we contact you only by phone and not by mail. We are required to accommodate reasonable requests if you inform us that the disclosure of all or part of your health information could place you in danger. Requests for confidential communications must be in writing, signed by you or your representative, and sent to our offices at the address provided at the end of this notice.

**2. You Can Request Use and Disclose Restrictions** — You can request that we restrict our use and disclosure of your health information relating to payment of benefits or our business operations. You also have the right to request limited disclosure of health information to individuals involved in your health care or payment for your care such as family members, friends, and limited uses and disclosures for disaster relief purposes.

Your written request for this restriction must describe in detail the restriction(s) you are requesting. We are not *required* to agree to your request but will attempt to accommodate when appropriate. We retain the right to terminate any agreed

restriction. In the event of a termination by us, we will notify you of such termination. You also have the right to terminate any agreed upon restriction by writing to us at the address provided at the end of this notice.

**3. You Have The Right To Inspect and Have Copies Of Your Health Information** — You can review or get copies of certain health information that we maintain about you. Request Forms are available by writing to the address at the end of this notice. We may charge you a fee for the costs of copying, mailing and the labor and supplies associated with your written request.

**4. You May Request an Amendment to Your Health Information** — If you believe that the health information we have is incorrect or incomplete, you have the right to request that we amend the information. We are not obligated to make all requested amendments but will give each request careful consideration. All amendment requests must be in writing, signed by you or your representative, and must state the reasons for the requested amendment.

**5. You Can Request To Have An Accounting of Any Disclosures** — If Combined makes your health information available to others; you may request a list or an "accounting of disclosures" from us. Examples of disclosures that we are required to account for include those to state insurance departments, disclosure required by a court of law (such as a court order or a subpoena), or for law enforcement purposes. We are not required to keep an accounting of disclosures made to underwrite an insurance application from you, for resolution of a claim for benefits, or those disclosures made as a result of a written authorization from you.

Requests must be in writing and must include the stated period you wish disclosed. The time period requested cannot be for longer than six years and may not include dates before April 14, 2003 (date when this law takes effect). The first list you request within a twelve-month period is free of charge but we are permitted to charge for any additional list requests during that same period. Should you submit an additional list request, Combined will advise you of any costs and permit you to withdraw your request before incurring any charges.

**6. You Have A Right To A Paper Copy Of This Notice** — At any time by contacting us at the address or telephone number below.

**7. You Have The Right To File A Complaint** — If you believe your privacy rights have been violated, you may file a complaint with us at the address below. You may also file a complaint with the U.S. Secretary of Health and Human Services in Washington, DC. All complaints must be submitted in writing. There can be no retaliation for filing a complaint.

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**To Contact Us In Writing**

Send your letter to:

Combined Life Insurance Company of New York  
Attention: HIPAA Privacy Office  
P.O. Box 6705  
Scranton, PA 18505-0705

**To Contact Us If You Want More Information**

Call our Toll Free Customer Service number and select the **HIPAA** option when prompted. 1-800-951-6206