



Medicare Advantage Specialists, Inc.

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| <p>MAS Policy and Procedures President / CEO: George Jerry Klamer Compliance Officer: Jason M. Perry</p> | <p>Effective Date: 12/03/2014</p> |
| <p>Policy Title: Privacy & Security –Personal Information Privacy & data protection policy</p> | <p>Document Number: .5</p> |

I. POLICY APPLICABILITY

| Stakeholders | Products | Functional Owners |
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| Sales Distribution Operations Compliance Legal Quality Assurance Regulatory Affairs Sales Leadership Sales Training and Development | <ol style="list-style-type: none"> All Insurance federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, Prescription Drug Plans, and Life Insurance. All Medicare or Insurance state regulated products including all Medicare Supplement Insurance Plans. | Medicare Advantage Specialists, Inc. and all of its home office employees. |

II. POLICY STATEMENT

Outlined within the core Policy and Procedures below, detailing the specific responsibility to the administration and governance of the requirements stated in the policy.

III. POLICY PURPOSE (Scope)

Medicare Advantage Specialists and its brokers rely on information for their success. Managing our Personal Information responsibly and legally serves our business objectives and helps build trust with stakeholders such as customers, brokers, partners, and regulators.

IV. POLICY DEFINITIONS

Business Organization – Medicare Advantage Specialists, Inc and all of its internal staff and contracted brokers.

Personal Information – is information about an individual

- that is created or received by or on behalf of a Business Organization; and
- that identifies the individual, or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

By way of example, Personal Information includes "Protected Health Information" as defined and regulated in the HIPAA Privacy Rule, "Non-public personal information" as defined and regulated in the Gramm-Leach-Bliley Act, and "personal data" under Directive 95/46/EC of the European Parliament.



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V. POLICY PROVISIONS and EXHIBITS (Procedure)

1. Use and Retention:

- 1.1. MAS brokers, agents and agencies will only use and store Personal Information for legitimate business purposes, consistent with this Policy, legal requirements, and any applicable privacy notices provided to the individual.
- 1.2. MAS brokers, agents and agencies will retain Personal Information used to meet business needs and satisfy legal requirements. Business Organizations are responsible for developing reasonable policies and procedures for the retention and secure disposal of Personal Information in accordance with applicable law and in conformance with the Information Risk Management Information Security policies and insurance carriers Records and Information Management Retention Policy and Retention Schedule.

2. Disclosure and Transfers

- 2.1. Disclosures of Personal Information to vendors, contractors, service providers, and other third parties must be consistent with applicable privacy notices, contracts, agreements and laws. Such disclosures should be limited to the minimum necessary for the intended purpose.
- 2.2. Prior to disclosing Personal Information to vendors, contractors, service providers, and other third parties, MAS brokers, agents and agencies will ensure that: the transfer of the Personal Information is secure; the person, system or entity allowed to receive information is identified; and where appropriate or required by law, the third party is contractually committed to protecting the information and limiting its use and disclosure.
- 2.3. MAS brokers, agents and agencies will allow the transfer of Personal Information to, or allow access by entities only for legitimate business purposes, and only when the Business Organization is assured that the information will be lawfully processed and protected.
- 2.4. MAS brokers, agents and agencies are responsible for identifying their obligations under local law and for determining that obligations are met related to the handling, protection and transfer of Personal Information.
- 2.5. MAS brokers, agents and agencies are restricted from marketing any carrier data to entities unless the entity has been explicitly authorized. Violating this policy can result up to but not limited to suspension, termination and or reporting of the violation to the appropriate authorities.

3. Privacy & Security

- 3.1. MAS, brokers, agents and agencies, will establish, implement, and monitor reasonable administrative, physical, and technical information security safeguards to protect Personal Information, based on its sensitivity and criticality, from unauthorized access, disclosure, corruption, or loss. By way of example, Personal Information includes "Protected Health Information" as defined and regulated in the HIPAA Privacy Rule, "Non-public personal

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information" as defined and regulated in the Gramm-Leach-Bliley Act, and "personal data" under Directive 95/46/EC of the European Parliament.

4. Data Quality

4.1. MAS, brokers, agents and agencies will take reasonable actions to maintain accurate, complete, and up-to-date Personal Information.

5. Collection

1. Each MAS broker, agent or agency will collect Personal Information lawfully, and will require the same of third parties that collect information on their behalf.
2. The collection of Personal Information should be limited to that which is relevant and appropriate for purposes of providing a product or service, employment of individuals or engagement of contract workers and temporary staff, or is required by law.
3. The definition of sensitive Personal Information varies across jurisdictions and can include information regarding race, ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, commission or alleged commission of offenses, court proceedings, financial information, government-issued identification numbers (such as social security numbers), and more. Business Organizations will limit the collection of sensitive Personal Information to that related to a legitimate business purpose. Where required by law, FMO/Business Organizations will collect sensitive Personal Information only with the consent of the individual.

6. Monitoring and Enforcement

- 6.1. MAS, brokers, agents and agencies are responsible for compliance with privacy laws, as well as for promptly raising any concerns about possible violations of this Policy. If you are aware of a situation that you believe may be in violation of this Policy or otherwise unlawful, you should immediately contact your manager, and MAS compliance officer Jason M. Perry at 205.263.8400.
- 6.2. MAS will promptly report any incidents of non-compliance with this Policy and its supporting guidelines to both the Legal Department and the Insurance carrier Privacy Office. In cooperation with the Privacy Office, Business Organizations are responsible for investigating reported incidents and taking appropriate actions and notification, if required, stemming from reported privacy incidents. Business Organizations will keep the Privacy Office informed of all investigations, results, employee discipline, legal action, and risk mitigation involved.
- 6.3. MAS will review controls relevant to the implementation of this Policy for their effectiveness.

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- 6.4. MAS management will address privacy complaints following an established process.
- 6.5. If MAS determines that a broker, agent or agency has violated this Policy, the broker, agent or agency will be subject to discipline. Discipline may include warnings, suspension with or without pay, and/or termination. Factors to be considered in assessing disciplinary actions include, but are not limited to: the extent of the violation, the nature of the violation (accidental, inadvertent, or purposeful misconduct), the potential harm or risk created by the disclosure for the individuals whose information was released, the client company or other data source, whether the broker, agent or agency self-reported and was forthcoming in the investigation and whether there has been repeated or purposeful misconduct or violations of MAS policies and procedures by the broker, agent or agency. The discipline to be applied in an individual case will be reviewed at a senior management level to ensure that consequences are appropriate.
- 6.6. Access to the MAS home office network is encrypted and only accessible by employees in good standing. If an employee is terminated, access to the network and physical address are immediately revoked and voided. The security of the network is maintained by US Tek, in Pelham, AL. Daily checks are done to ensure the integrity of the system. No outside portable storage devices are allowed to be used onsite without the consent of George Jerry Klamer. Logistical and physical access can be turned on and off at will by George Jerry Klamer, President/CEO.
- 6.7. All incidents/breaches shall be immediately reported to MAS Compliance Officer Jason M. Perry jperry@medadvspc.com, MAS President George Jerry Klamer jklamer@medadvspc.com and the specific carrier/carriers that the incident/breach could possibly affect. The United HealthCare Privacy and Security, Legal and Compliance departments by using the following contacts:
 United Health Group Privacy Office UHG_Privacy_Office@uhc.com, United Health Group Support Center at 1-888-848-3375 or Compliance and Ethics Help Center 1-800-455-4521

7. TRAINING DOCUMENTATION



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| Employee Name – PRINT | Employee Signature | Name of Training MAS HIPPA Training | Date of Training | Manager's Initials |
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8. DOCUMENT HISTORY

| Version No. | Date | Comments |
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| .5 | 12/03/2014 | Version drafted for "Compliance Checkup" |
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