

## **Personal Information (Including Social Security Number) Privacy Protection Policy**

J P Carter Company maintains policies that protect the confidentiality of personal information, including Social Security numbers, obtained from its members and associates in the course of its regular business functions. J P Carter Company is committed to protecting information about its customers and associates, especially the confidential nature of their personal information (PI).

Personal Information is information that is capable of being associated with an individual through one or more identifiers including but not limited to, a Social Security number, a driver's license number, a state identification card number, an account number, a credit or debit card number, a passport number, an alien registration number or a health insurance identification number, and does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media.

- J P Carter Company is committed to protecting the confidentiality of Social Security numbers and other Personal Information.
- J P Carter Company's Privacy Policy imposes a number of standards to:
  - guard the confidentiality of Social Security numbers and other personal information,
  - prohibit the unlawful disclosure of Social Security numbers, and
  - limit access to Social Security numbers.
- J P Carter Company will not use or share Social Security numbers or personal information with anyone outside the company except when permitted or required by federal and state law.

J P Carter Company must only access Social Security numbers or personal information as required by their job duties. J P Carter Company has in place a minimum necessary policy which states that associates may only access, use or disclose Social Security numbers or personal information to complete a specific task and as allowed by law.

J P Carter Company safeguards Social Security numbers and other personal information by having physical, technical, and administrative safeguards in place.

Welcome to J P Carter Company's web sites. We appreciate your interest in us and hope to make your on-line experience enjoyable and secure. Your privacy is very important to us and we will make every reasonable effort to safeguard any information we collect. We will not sell your personally identifiable information without your express written permission.

## **HIPAA Notice of Privacy Practices**

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule allows members the right to receive a notice that describes how individual health information may be used and/or disclosed and how to acquire access to this information. J P Carter Company is an agent for licensed health plans. The are federally mandated to send a notice (Notice of Privacy Practices) to members of their fully insured health benefits plans. If you become a customer of the J P Carter Company through one of our contracted health companies, they will notify you of

their Privacy policy.

### **Contacting the Privacy Office**

J P Carter Company's Privacy Office is available to answer privacy questions or for reporting privacy issues. You may contact the Privacy Office by contacting us at 5301 Lee Avenue, Richmond, VA 23226.

### **What information will J P Carter Company collect?**

Information may be collected in two ways on our websites. You may elect to establish an account on our web site so that you can gain additional access to on-line service applications, health tools, health information, subscriptions or other services where it is important for us to know who you are in order to best meet your needs. Personal information will not be collected from you without your knowledge. Providing personal information is always voluntary. Second, we may use "cookies" to help us improve our web site by tracking your navigation habits and to store some of your preferences. A cookie is a small file created by an Internet site to store information on your computer. Cookies do not allow web sites to gain access to other information on your computer. Once a cookie is saved on your computer, only the Web site that created the cookie can read it.

### **Linking to Other Sites**

From time to time we will provide links to other web sites, not owned or controlled by J P Carter Company. We do this because we think this information might be of interest or use to you or where, as a member, we can provide you with value added services. While we do our best to ensure your privacy, we cannot be responsible for the privacy practices of other sites. A link to a non-J P Carter Company web site does not constitute or imply endorsement by J P Carter Company. Additionally, we cannot guarantee the quality or accuracy of information presented on non-J P Carter Company web sites. We encourage you to review the privacy practices of any web site you visit.

### **What if I don't want information about me to be collected?**

Providing personal information through J P Carter's web site is an option. Additionally, personally identifiable information will not be collected from you without your knowledge and approval.

### **How will information collected about me be used?**

Information you share with us will be used in a variety of ways that let us serve you better. We may also use this information to perform administrative, technical, hosting or other functions that

help us manage our site and deliver new functionality to you.

### **Use of electronic mail**

We may provide email links on our site to further facilitate communication between J P Carter Company and you. Information collected through electronic mail may be shared with our employees or other third parties that perform services on our behalf. Unless otherwise noted, electronic mail on our site is not a completely secure and confidential means of communication. Non-encrypted electronic communications may be accessed and viewed by other Internet users without your knowledge and permission while in transit to us. Therefore, we recommend that you contact us by phone using one of the numbers found on our web site or whenever you are communicating personal information to us.

### **Changes to our Web Privacy Statement**

The foregoing Web Privacy Statement is effective as of January 1, 2012. J P Carter Company may change this statement from time to time without notice. This statement is not intended to and does not create any contractual or other legal right in or on behalf of any party.

Again, we hope to make your on-line experience enjoyable and secure and thank you for taking the time to read this Privacy Statement.