

NOTICE OF
PRIVACY PRACTICES



Dean

HEALTH PLAN

subsidiary of Dean Health Insurance, Inc.

Notice of Privacy Practices

This notice describes how your medical information may be used or disclosed, and how you can access this information.

PLEASE REVIEW THIS NOTICE CAREFULLY.

Protecting the Privacy of Your Personal Health Information

Dean is required by law to maintain the privacy of your health information and provide you with written notification of our legal duties and privacy practices concerning your health information. The privacy of your nonpublic personal health and financial information (collectively referred to as “nonpublic personal information”) is very important to us at Dean. This Notice describes how we protect the confidentiality of the nonpublic personal information we receive on all members, including former members. Brief explanations of the manner in which we obtain, use, and protect your nonpublic personal information follows.

If you have questions about any part of this Notice, complaints regarding our privacy practices, or if you want more information about our privacy practices, please contact us at the following address, or call the Dean Customer Service Department at 1-800-279-1309:

**Privacy Officer
1277 Deming Way
Madison, Wisconsin 53717**

What Types of Nonpublic Personal Information Does Dean Collect About You?

We collect a variety of nonpublic personal information needed to administer health insurance coverage and benefits. We collect nonpublic personal information about you from some of the following sources:

- Information we receive directly or indirectly from your applications, surveys or other forms, in writing, in person, by telephone or electronically. Examples include name, address, social security number, date of birth, marital status, and medical history.
- Information about your transactions with us, our affiliates, our providers, our agents, and others. This includes information from health care claims, medical history, eligibility information, payment information, service request, and appeal and grievance information.
- Information you authorize us to collect from others.

When Dean May Not Use or Disclose Your Health Information

We will not use or disclose your health information without your written authorization except as described in this Notice and as allowed under the law. If you do authorize us to use or disclose your health information for another purpose, you may revoke your authorization in writing at any time. If you revoke your authorization, we will no longer be able to use or disclose health information about you for the reasons covered by your written authorization, although we will be unable to take back any disclosures we have already made.

How Dean May Use or Disclose Your Health Information

We will not disclose your nonpublic personal information unless we are allowed or required by law to do so. The following categories describe the ways that Dean may use and disclose your nonpublic personal information. For each category of uses and disclosures, we will explain what we mean and present some examples. Not every use or disclosure we might make will be listed.

We are allowed to use and disclose information that falls within one of the following categories:

- 1. Payment Functions.** We may use or disclose your health information to make or collect payment for treatment or services you receive. For example, we may use or disclose your health information to: determine your eligibility for plan benefits, obtain premiums, determine your health plan’s responsibility for benefits, and collect payment from third parties such as other health plans or providers for the care you receive.
- 2. Health Care Operations.** We may use and disclose your health information to carry out necessary insurance-related activities and to provide coverage and services to you. Health care operations include such activities as:
 - Underwriting, premium rating or related functions to create, renew, or to replace health insurance or benefits.
 - Quality assessment and improvement activities.
 - Activities designed to improve health or reduce health care cost.
 - Clinical guideline and protocol development or case management and care coordination.
 - Accreditation, certification, licensing or credentialing activities.
 - Reviews and auditing, including fraud and abuse detection programs, medical reviews, legal services, audit services, and compliance-related programs.
 - Business planning and development, including cost management and planning, and related analyses and formulary development.
 - Submitting claims for stop-loss coverage.
 - Business management and general Dean administrative activities, including customer service efforts and resolution of internal grievances.

3. Treatment Alternatives. We may contact you or your health care providers with information about treatment alternatives and other related functions that may be of interest to you.

4. Distributing Health-Related Benefits and Services. We may use or disclose your health information to provide information on health-related benefits and services that may be of interest to you.

5. Required by Law. We may use and disclose your health information as required by any federal, state, or local law. For example, we may disclose medical information when required by a court order in a litigation proceeding, such as a malpractice action.

6. Public Health. As required by law, we may disclose your health information to public health authorities for purposes related to: preventing or controlling disease, injury or disability; reporting child abuse or neglect; reporting domestic violence; reporting to the Food and Drug Administration problems with products and reactions to medications; and reporting disease or infection exposure.

7. Health Oversight Activities. We may disclose your health information to health agencies for authorized activities, including audits, civil administrative or criminal investigations, inspections, licensure or disciplinary action, and other proceedings related to overseeing the health care system.

8. In Connection with Judicial and Administrative Proceedings. As permitted or required by state law, we may disclose your health information in the course of any administrative or judicial proceeding. This may be in response to the order of a court or administrative tribunal as expressly authorized by such order, or in response to a subpoena, discovery request, or other lawful process. We must make a reasonable effort either to notify you about the request or to obtain an order protecting your health information.

9. Law Enforcement. As permitted or required by state law, we may disclose your health information to a law enforcement official for certain law enforcement purposes including situations such as: locating a suspect, fugitive, material witness or missing person; complying with a court order; reporting a crime; or if there is a suspicion that your death was a result of criminal conduct.

10. In the Event of a Serious Threat to Health or Safety. We may, consistent with applicable law and ethical standards of conduct, disclose your health information if we believe that such a disclosure is necessary to prevent or lessen a serious and imminent threat to your health or safety or to the health and safety of the public.

11. Specified Government Functions. In certain circumstances, federal regulations require us to use or disclose your health information to assist with government functions relating to military and veterans, national security and intelligence activities, protective services for the President and others, and correctional institutions and inmates.

12. Disclosure to Plan Sponsors. If applicable, we may disclose your health information to the sponsor of your group health plan for purposes of administering benefits under the plan.



How Does Dean Protect This Information?

We limit the collection of nonpublic personal information to that which is necessary to administer our business, provide quality service, and meet regulatory requirements.

We maintain physical, electronic, and procedural safeguards that comply with federal regulations to safeguard your nonpublic personal information. We limit the internal use of oral, written, and electronic nonpublic personal information about you and ensure that only authorized staff with the need to know have access to it. We maintain safeguards for your nonpublic personal information and review them regularly to protect your privacy.

Opting Out of Information Sharing or Gathering

From time to time, you may have received notices from other entities that provide you an opportunity to “opt out” of certain disclosures. The most common type of disclosure associated with an “opt out” is the disclosure of personal information to a non-affiliated company that would allow that company to market its products or services to you. Many federal and state laws that we must comply with prohibit us from making these types of disclosures. Because we do not make these types of disclosures, it is not necessary for you to complete an “opt out” form or take any action to restrict such disclosures.

Statement of Your Health Information Rights

1. Right to Request Restrictions. You have the right to request restrictions on certain uses and disclosures of your health information. However, Dean is not required to agree to the restrictions that you request. If you would like to make a request

for restrictions, you must make your request in writing to our Privacy Officer at the address included in the beginning of this Notice, or contact the Dean Customer Service Department for a copy of Dean's "Request for Restrictions on Use/Disclosure of PHI" form to complete.

2. Right to Request Confidential Communications. You have the right to receive your health information through a reasonable alternative means or at an alternative location. For example, you may ask that we only communicate with you at a certain telephone number or by mail if you feel the disclosure of your health information through normal means could endanger you. If you wish to request confidential communications, you must make your request in writing to our Privacy Officer at the address included in the beginning of this Notice, or contact the Dean Customer Service Department for a copy of Dean's "Request for Confidential Communications" form to complete. We will attempt to honor your reasonable requests for confidential communications, but retain the right to deny such requests.

3. Right to Inspect and Copy. You have the right to inspect and copy health information about you. This does not include psychotherapy notes. To inspect and copy your information, you must make your request in writing to our Privacy Officer at the address included in the beginning of this Notice, or contact the Dean Customer Service Department for a copy of Dean's "Request for Access to Personal Health Information" form to complete. We may charge you a reasonable fee to cover expenses associated with your request.

4. Right to Request Amendment. You have a right to request that Dean amend health information held by Dean that you believe is incorrect or incomplete. We are not required to amend your health information. If we deny your request, we will provide you with a reason for our denial and how you can disagree with our denial. To request an amendment, you must make your request, including the reason for your request, in writing to our Privacy Officer at the address included in the beginning of this Notice, or contact the Dean Customer Service Department for a copy of Dean's "Request to Amend Health Information" form to complete.

5. Right to Accounting of Disclosures. Under the Privacy Rule, we must keep a record of certain disclosures of your health information and you have the right to receive a list of these disclosures. These may include health information used for public purposes authorized by law or uses that are not in accordance with our privacy policies or applicable law. You must make your request in writing to our Privacy Officer at the address included in the beginning of this Notice, or contact the Dean Customer Service Department for a copy of Dean's "Request for Access to Personal Health Information" form to complete. Also, your accounting request should specify the time period of the information you want, which may not start earlier than April 14, 2003, and may not be for periods of time going back more than six (6) years. We will provide the first accounting you request during any 12-month period at no charge. Subsequent accounting requests may require a reasonable fee. We will inform you in advance of any applicable fee.

6. Right to Paper Copy. You have a right to receive a paper copy of this Notice at any time. To obtain a paper copy of this Notice, send your written request to our Customer Service Department at 1277 Deming Way, Madison, WI 53717. You may also obtain a copy of this Notice at our website, www.deancare.com.

Changes to this Notice of Privacy Practices

Dean reserves the right to amend this Notice at any time, and to make the new provisions effective for all nonpublic personal information we maintain. When making material changes, we will promptly revise and distribute our Notice to you. Until then, Dean must comply with the current version of this Notice.

Complaints

Please submit complaints about this Notice or how we handle your health information, in writing, to our Privacy Officer. Dean will not hold any complaint you submit against you in any way. In addition, if you believe your privacy rights have been violated, you may file a complaint with the Secretary of the federal Department of Health and Human Services.

The effective date of this Notice is September 20, 2007.