

# Online Privacy Policy

Mountain State Blue Cross Blue Shield (“Mountain State BCBS”) has engaged Highmark Inc. (herein referred to as “Administrator”) to administer this Web site. References throughout this online privacy policy to “we,” “us,” or “our” refer to Mountain State BCBS as the site owner. We want to assure Users of our Web sites (meaning any individual, including site visitors as well as those individuals who provide personal information via this Web site, herein referred to as “User(s)”) that their information is secure and maintained in confidence, consistent with applicable state and federal laws. Please read through the following pages, which describe our online privacy policy.

## I. Information Collected Online

### A. General

How you use our Web site will determine whether or not we need to collect information from you and how much information we collect. For many features, we do not require any information on who you are or ask questions about you. For some of our features, we need to either verify your identity through a login process, or collect sufficient information from you to provide the service of that feature.

### B. Email, Product Inquiry

We invite Users to send us secure messages regarding Web site accounts or our products or services. The Web site Administrator retains copies of these secure messages for 1,000 days, but does not disclose secure messages to any non-affiliated third parties.

The information provided through the use of these secure messages and feedback forms will be used by our representatives or other appropriate third parties who need to view this information to respond to the inquiry.

Members have the ability to discuss medical issues online with health coaches through the Blues On Call feature. Messages sent by or to members who choose to use these online services will be recorded in transaction logs, which may be reviewed to monitor the overall effectiveness of the services and the responsiveness of the physicians and health coaches.

We also invite Users to send emails and access products and services from non-related service providers through links on the Mountain State BCBS Web pages. Users should also review the privacy policies contained on these Web sites for information regarding how the service providers use the information.

### C. Use of Cookies

A cookie is a small piece of information about an Internet session that may be created when an individual accesses a Web site.

Cookies can contain a variety of information, including the name of the Web site that issued them, where on the site the User visited, passwords, and even User names and credit card numbers that have been supplied via forms. Note that most Web browsers can be modified by the User to prevent cookies from being attached to the User.

Our Web site, and certain sites it provides links to, use cookies to facilitate easier navigation within the sites and to provide a higher level of convenience for Users, and for internal reporting and statistical purposes. The use of cookies by the linked site is subject to the company's own privacy policies and in some circumstances is subject to our contractual obligations with the company.

## **II. Use of Information Collected Online**

We do not sell your non-public personal information to anyone.

All information submitted by any individual to us may be retained to provide a record of such communications and to comply with any applicable legal and/or regulatory requirements and may be verified for accuracy. In addition:

We use any information submitted by you on our Web sites as well as information submitted by you on sites of non-related service providers that are linked to Mountain State BCBS to provide improved customer service, to provide relevant health care related information, to update information we have about you and/or your group, and to monitor the effectiveness of our online services. In some cases, we may use such information to provide you with access to information on our products and services and to those offered by our affiliates.

If you request to receive e-mail Web site updates and special notices from our Web sites, we will use the name and e-mail information you supply to provide those e-mails through our own facilities or those of a contracted service supplier. You may remove yourself from these mailings at any time by following the removal instructions included in all such messages. Your e-mail address information will be used only for Mountain State BCBS-related mailings and will not be given, sold or rented to any other party for any other use without your prior approval.

Information may also be "cleansed" (stripped of any information which could identify you personally, such as your name or e-mail address), aggregated with other data, and used for general research, classification purposes, marketing, or other purposes without permission, but only in non-individually identifiable forms.

## **III. Access to Information Collected Online**

### **A. Employees**

Certain employees may be provided with information regarding Users in order to respond to the individual's needs and provide requested information regarding specific products or

services. Certain employees will also be provided with information regarding Users in order to administer their or their group's benefit programs and to monitor the effectiveness of the online services. Our employees are required, by written confidentiality statements, corporate policies, and state or federal laws or regulations to maintain the confidentiality of personal information and to use strict standards of care in handling the information. Employees who do not conform to these confidentiality requirements are subject to disciplinary sanctions that may include dismissal.

#### B. Mountain State BCBS Affiliates, Business Associates and Service Providers

We may disclose Users' personal information collected through our Web sites as permitted by law to affiliates including, but not limited to, Preventive Health Services, along with non-related service providers that assist us in meeting the needs of our customers. Information collected by affiliates and non-related service providers may also be shared with us as permitted by law. All such information will be disclosed to respond to the individual's needs and to provide information about products or services offered by or through Mountain State BCBS, our affiliates and the non-related service providers. Personal information is treated with the same standards of confidentiality that we apply to other confidential information. Our subsidiaries and affiliates are subject to our corporate policies regarding privacy and confidentiality and our non-related service providers and Business Associates are legally bound by contract to employ at least the same strict standards of confidentiality as we employ.

#### C. Third Parties

Other than as set forth above, the Web site Administrator does not transmit any personal information collected through our Web sites to any third party without the permission of the individual. Personal information may be transmitted, however, if there is a specific need to complete a transaction requested by the individual. Health plan administrators will have access to online enrollment applications, but not to other personal information we collect online.

#### D. Online Communication Services

We have access to messages sent by or to members who choose to use any online communications services (e.g. Blues On Call). We will not release the content of specific messages to any third party without the member's consent, unless permissible or required under applicable state or federal law.

## **IV. Compliance Assurance**

#### A. Security

The Web site Administrator uses commercially reasonable computer security technology selected and implemented to provide adherence to the security and privacy policies described in this online posting. Although reasonable efforts have been made to protect your information from unauthorized use or alteration, you should be aware there is always some risk in sending information over the Internet.

#### B. Account Access

Consistent with the requirements set forth under certain state and federal laws, we grant access to personal information only to those employees, affiliates and third parties as required to provide healthcare products and services, or as you permit. All such employees, affiliates and third parties are subject to privacy policies, at least as restrictive as the policy described in this online document.

#### C. Internal Compliance Program

Both the Web site Administrator and Mountain State BCBS maintain an internal privacy compliance program to ensure compliance with this privacy policy. This program includes oversight of the compliance program by a Chief Privacy Officer whose function is to create, maintain, and enforce privacy procedures in accordance with this policy. We also have a Chief Information Security Officer who oversees our information security systems and procedures. Additionally, our compliance programs include on-going employee training, on-going maintenance and updating of security systems and practices and maintenance of customer feedback and complaint resolution process. We reserve the right to amend this policy at any time.

#### D. Questions and Concerns

If you have questions about this online privacy policy, or concerns regarding your personal information, please send us your question by clicking Contact Us from the bottom of any of our Web pages. Users who access this Web site through the use of a password may contact us by clicking Message Center from the top of any of our Web pages.

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