

THE BERG ANDONIAN, INC. PRIVACY POLICY

Recent State legislation (the Patient's Bill of Rights) and federal law (Gramm-Leach-Bliley Act) adds additional privacy protection to consumers of healthcare and other benefit program services. The description of our privacy policy is as follows:

OUR COMMITMENT TO PRIVACY

Berg Andonian, Inc. is committed to carefully guarding the private information entrusted to us. Berg Andonian, Inc. does not share private health information except as required or permitted by law.

INFORMATION WE COLLECT

There are two types of information we collect:

Information Type A: First, in the normal course of conducting business for a client we typically collect private information including: name, address, social security number, income, marital status, job title, Medicare eligibility, the plans you are enrolled in (including other coverage), and similar information on those enrolled as dependents. A detailed health statement is sometimes collected for small group or individual health products. This information is used to develop a group census for the purpose of placing health insurance and other benefit plan business.

Information Type B: Secondly, other information may be collected if you or an authorized person contacts us for assistance with your claim or customer service issue. In this case we collect detailed personal health information. Examples of information we collect to assist you include the date of service, the provider of service, the diagnosis or type of claim, the dollar amounts involved, type of disability and monthly income (for disability), detailed current health status and beneficiary information (for life insurance), and retirement account balance and deferral amounts (for 401(k)). This information is used to service health insurance and other benefit plan business.

HOW THIS INFORMATION COMES TO US

Type A information comes to us from any of the following sources: It is received on application forms and other enrollment forms, copies of which we sometimes keep on file, and it is received from your employer who provides us with information in order for us to develop accurate census information.

Type B information comes to us from you or the person(s) you authorize (in writing or not) to assist you, such as your employer or Human Resources staff.

IMPORTANT NOTE

We will assume you have given authorization for another person to assist you if that person provides us with a signed written release *or* gives us the following information that could only be known if you provided it to them: your name and social security number, date of the service provided, provider name, and reason for your service/visit.

INFORMATION WE SHARE

In the normal course of conducting business we share private information with insurance carriers and benefit companies with whom we do business. We do not share private information with third parties except as required by law.

HOW WE PROTECT PRIVATE INFORMATION

We restrict access to private Type A information to our employees, employees of insurance carriers and benefit companies, and our clients (typically an employer) who need the information to provide our brokering and consulting services. We restrict access to private Type B information to our employees, and employees of insurance carriers and benefit companies who need the information to provide ongoing service to our clients. We will not share private Type B information without your authorization. An authorization may be either written or assumed. An assumed authorization is when your designee has information regarding your issue as discussed in the "Important Note" section above.

