

Privacy Statement

Introduction

The Printing Industries Benefit Trust (“PIBT”) provides a website and a secure portal (hereinafter, collectively, the “Portal”) to allow our participants and other related users to view health plan-related information, to communicate with our staff, and to access additional services.

This Privacy Statement applies to the Portal, which are owned and operated by PIBT. This Privacy Statement describes how PIBT collects and uses the personal information you provide on, and other information that is collected from your use of the Portal. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

All of your protected health information maintained by PIBT, including information you provide on the Portal, is also subject to the Privacy Practices followed by PIBT under the Health Insurance Portability and Accountability Act (“HIPAA”). The Privacy Practices may contain additional provisions relating to the use and disclosure of your information that go beyond the terms of our Privacy Statement and can be found under “Resources” on the Portal.

PIBT is committed to protecting the privacy of the users of the Portal. We will use and disclose your personal information as stated in this Privacy Statement.

The Portal Privacy Statement

Use and disclosure of health information includes using the information to enroll you and your dependents, if any, in health plans and to bill and collect the premiums for the coverage you select. Our use and disclosure of an individual's personal information (including health information) is limited as required by state and federal law. We do not sell or rent personal information about visitors to the Portal.

Security

The Portal has security measures in place that are intended to help protect against the loss, misuse, unauthorized access or alteration of information under our control. These measures include encryption of data using the Secure Socket Layer (SSL) system, and using a secured messaging service when we communicate with you through the Portal. Despite these measures, the confidentiality of any communication or material transmitted to or from us via the Portal by Internet, text message or email cannot be guaranteed. At your discretion, you may contact us at the mailing address or telephone number listed in the "Questions, Complaints and Contacts" section at the end of this Privacy Statement.

Revisions to the Privacy Statement

We may revise this Privacy Statement from time to time as we add new features or modify the way in which we manage information or as laws change that may affect our services. If we make material changes to our Privacy Statement, we will post notice of this on the Portal prior to the changes becoming effective. Any revised Privacy Statement will apply both to information we already have about you at the time of the change, and any personal information created or received after the change takes effect.

Portal Data

In addition to web logs, described below, PIBT routinely gathers data on the Portal activity, such as how many people visit the Portal, the web pages they visit, where they come from, how long they stay, etc. The data is collected on an aggregate, anonymous basis, which means that no personally identifiable information is associated with the data. This data helps us improve our content and overall usage. The information is not shared with other organizations for their independent use.

The Portal does not honor a browser's signal or header request not to track the user's activity.

Data Caching by the Portal

In order to ensure a good user experience, certain data may be temporarily or permanently cached by the Portal on users' mobile devices. Any data that is personally identifiable will be encrypted and will not be viewable by anyone without access to the user's User ID and Password.

Collecting, Using and Disclosing Personal Information

Except as disclosed in this Privacy Statement, we do not collect any personally identifiable information about visitors to the Portal. The policies, sources, uses and disclosures of information are outlined in Sections 1 through 19 that follow:

1. Information Collection, Use and Disclosure

We collect the following personal information from you:

- contact information such as name, email address, mailing address, and phone number;
- date of birth and social security number;
- unique identifiers such as user name, account number, and password; and
- certain limited health information.

We use and disclose this information to:

- communicate health information for you and your dependents in order to apply for coverage with insurance carriers and health care providers as needed to represent you;
- communicate on your behalf with health care providers as requested by you;
- respond to customer service requests;
- administer your account;
- send you newsletters, text messages or email communications;
- respond to your questions and concerns;
- improve the Portal and marketing efforts; and
- conduct internal quality improvement or business analysis.

2. Web Logs

We maintain standard web logs that record data about all visitors and customers who use the Portal and we store this information. These logs may contain the Internet domain from which you access the site (i.e., aol.com, abc.org, etc.); the IP address which is automatically assigned to your computer when you get on the Internet (a static IP address may be identifiable as being connected to you, while a dynamic address is usually not identifiable); the type of browser and operating system you use; the date and time you visited; the web pages you viewed; and the address of the website you linked from, if any. If you sign on to the Portal to use secured features, our web logs will also contain an individual identifier and show the services you have accessed.

All web logs are stored securely, and may only be accessed by PIBT employees or designees on a need-to-know basis for a specific purpose. PIBT uses web log information to help us design our Portal, to identify popular features, to resolve user, hardware, and software problems, to make the Portal more useful to visitors and for security purposes.

3. Internet Cookies

We may place Internet "cookies" on the computer hard drives of visitors to the Portal. Information we obtain from cookies helps us to tailor our Portal to be more helpful and efficient for our visitors. The cookie consists of a unique identifier that does not contain information about you or your health information. We use two types of cookies, "session" cookies and "persistent" cookies.

A session cookie is temporary, and expires after you end a session and close your web or app browser. We use session cookies to help customize your experience on our site, maintain your

signed-on status as you navigate through our features, and to track your "click path" through our Portal.

Persistent cookies remain on your hard drive after you've exited from our Portal, and we use them for several reasons. For instance, if you've given us permission to email you with information about your benefits, or for other reasons, we may place a persistent cookie on your hard drive that will let us know when you come back to visit our site. We sometimes use this type of persistent cookie with a "Web beacon" (see below). Persistent cookies will not contain any personal information about you such as a social security number.

You may have software on your computer that will allow you to decline or deactivate Internet cookies, but if you do so, some features of the Portal may not work properly for you. For instructions on how to remove cookies from your hard drive, go to your browser's website for detailed instructions. In addition, further information regarding cookies may be available on other websites or from your Internet service provider. Safari, Chrome, Firefox, Internet Explorer and iOS browsers are commonly used browsers.

4. Evaluation and Quality Improvement

We will periodically ask users to complete surveys asking about their experiences with features of the Portal. Our surveys ask visitors for demographic information such as age, gender, and education, but will not request that users provide specific information about any medical condition. We use survey information for evaluation and quality improvement purposes, including helping PIBT improve information and services offered through the Portal. In addition, users giving feedback may be individually contacted for follow-up due to concerns raised during the course of such evaluation. Demographic information and web log data may be stored for future evaluation and quality improvement activities.

5. Application for Coverage

During the application process you will be asked to disclose certain personal information so that your eligibility can be evaluated. Further, you will be asked to verify the truthfulness of your answers.

6. Messages and Transactions

Comments or questions sent to us using email or secure messaging forms will be shared with PIBT staff and, as appropriate, insurance carrier staff who are most able to address your concerns. We will archive your messages once we have made our best effort to provide you with a complete and satisfactory response.

7. Data Integrity and Correction

Requests to view and correct personal information from the Portal may be submitted using the contact information in the "Questions, Complaints and Contacts" section below.

If your personal information changes, or to update or request deletion of information collected on the Portal, please use the contact information in the "Questions, Complaints and Contacts" section below. We will respond to all access requests within 30 days.

8. Children

We do not knowingly collect personally identifiable information from children under the age of 13. If PIBT is made aware of collecting information from a child under 13 we will delete this information.

9. Disclosures

We may disclose personal information to any person performing audit, legal, operational, or other services for us. We will use information which does not identify the individual for these activities

whenever reasonably possible. Information disclosed to vendors or contractors for operational purposes may not be re-disclosed to others by such a vendor or contractor, except as permitted by PIBT and applicable law.

We may also disclose your personal information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- as described in our Notices of Privacy Practices for protected health information;
- when we believe in good faith that disclosure is necessary to protect our rights, protect you or others from threats of imminent harm, investigate fraud or other activity in violation of the law, or respond to a government request;
- to protect the security and reliability of the Portal; and
- to any third party only with your prior consent to do so.

10. Opt Out

If a user makes a request to receive information in an ongoing manner through the Portal by providing an email address or mobile phone number the user may request to discontinue future mailings or messages. All materials sent to you by email or text message will contain information about how to opt out. Please note, however, that you cannot opt out of certain messages, such as an email letting you alerting you to a change in your census.

11. Other Requests to Limit Use and Disclosure of Your Personal Information

State and federal laws may allow you to request that we limit our uses and disclosures of your personal information for plan/benefit administration and payment purposes. We will consider all requests and, if we deny your request, we will notify you in writing. Federal law requires us to agree to your request to restrict disclosures to a health plan or insurer relating to specific health care services, if you have paid for those services in full. The law does not, however, require us to restrict any disclosures we think are important for treatment purposes.

12. Data Retention

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

13. Links to Third-Party Websites

The Portal includes links to other websites whose privacy practices may differ from those of PIBT. If you submit personal information to any of those sites, your information is governed by their privacy statements.

Questions, Complaints and Contacts

If you have any questions about this Privacy Statement, our policies and practices concerning the Portal, your rights under this statement, and your dealings with the PIBT Portal, you can contact PIBT at (800) 449-4898 (toll free) or by sending a message to the Online Help Desk at OnlineHelpDesk@piasc.org, or by U.S. mail to the address below:

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