

Notice of Privacy Practices



Virtual Benefits Group (herein "VGB") places a high value on the privacy of its employees, agents, marketing representatives, clients, and prospects and the expectation that information regarding employees, agents, marketing representatives, clients and prospects remains confidential and is made available only to persons who have a legitimate right to know. VGB recognizes that all employees, agents, marketing representatives, clients, and prospects, as well as outside vendors or affiliates, have an ethical and legal obligation to keep certain information about employees, agents, marketing representatives, clients, and prospects confidential and to protect and safeguard this information against tampering and unauthorized use of disclosure.

This privacy policy concerns protected health information ("PHI"). PHI, as defined by the federal law means any individually identifiable health information of an employee, agent, marketing representative, client, or prospect, including, but not limited to: social security number, name, address, birth date, age, telephone number, subscriber number, policy number, e-mail address, fax number and medical records.

PHI is not confined to written materials, facsimiles, or hard copy, but also includes information derived from any source, including, but not limited to: e-mail, computer data, data stored on electronic media, disks, or personal digital assistants, verbal communication or recordings and visual observation.

VGB has adopted the following privacy procedure:

Disclosure of Information:

- An employee, agent, or marketing representative may access, discuss and use, and disclose PHI only for VGB business as it relates to that employee, agent, or marketing representative's specific job function and/or responsibilities.
- Employee, agent, or marketing representative may disclose PHI only to those who have a legitimate related business need to know or who have prior written authorization. PHI about an employee, agent, marketing representative, client, or prospect may only be shared for purposes of claims payment or healthcare operations.
- PHI should not be the subject of casual conversation.
- Only "Minimally Necessary" PHI may be disclosed. "Minimally Necessary" means only that amount of PHI necessary to accomplish that intended purpose of the use of disclosure.

Access to Information:

- PHI may only be accessed if related to specific job functions and responsibilities.
- Casual reading of PHI is not permitted.
- Employee, agent, and marketing representatives with legitimate access to PHI will protect this information from unauthorized access.

Security of PHI:

- Employees, agents, or marketing representatives who remove PHI from VGB's office, clients' office, prospects' office, or VGB proprietary software accessed internally or via secure internet access, for legitimate use relating to specific job functions and/or responsibilities have the responsibility to protect and safeguard all such information.
- Copies of PHI are to be destroyed after use.
- Employees, agents, and marketing representatives are encouraged to review PHI in a secure area. It is the responsibility of the employee, agent, or marketing representative to protect and safeguard PHI data and/or information that are removed from the secure area.

Breach of Confidentiality:

- Any employee, agent, or marketing representative who believes he/she has observed a breach of confidentiality should report it to the Director of Administration or one of the Executive Directors.
- Employee, agent, or marketing representatives found to be in violation of this policy may be subject to disciplinary action, up to, and including termination and/or legal action. PHI is protected by federal and state laws and regulations that define civil and criminal penalties for violations of confidentiality.

If you have any questions concerning this policy, please contact John Oliver or Bill Kleinkauf at (972)724-8900 or by mail at: 3535 Firewheel Drive Suite A, Flower Mound TX 75028.