

**A-1 MEDICAL, INC.  
PRIVACY POLICY  
EFFECTIVE MAY 1, 2011**

The following is the privacy policy of A-1 Medical, Inc., as described in the Health Insurance Portability and Accountability Act of 1996 and regulations promulgated, commonly known as HIPAA. HIPAA requires A-1 Medical, Inc. by law to maintain the privacy of personal health information and to provide PATIENTS with notice of A-1 Medical, Inc.'s legal duties and privacy policies with respect to PATIENTS' personal health information. A-1 Medical, Inc. is required by law to abide by the terms of this Privacy Policy.

**• Personal Health Information**

A-1 Medical, Inc. collects personal health information from PATIENTS through treatment, payment and related healthcare operations, the application and enrollment process, and/or healthcare providers or health plans, or through other means, as applicable. Personal health information that is protected by law broadly includes any information, oral written or recorded, that is created or received by certain health care entities, including health care providers, such as physicians and hospitals, as well as health insurance companies or plans. The law specifically protects health information and contains data, such as name, address, social security number, and others, that could be used to identify the individual patient who is associated with the health information.

**• Uses or Disclosures of Personal Health Information**

Generally, A-1 Medical, Inc. may not use or disclose personal health information without permission. Further, once permission has been obtained, A-1 Medical, Inc. must use or disclose personal health information in accordance with the specific terms of that permission. The following are circumstances under which A-1 Medical, Inc. is permitted by law to use or disclose personal health information.

**• Without Consent**

Without consent, A-1 Medical, Inc. may use or disclose personal health information in order to provide services and treatment required or requested or to collect payment for those services and to conduct other related healthcare operations otherwise permitted by law. A-1 Medical, Inc. is permitted to disclose personal health information within and among our workforce in order to accomplish these same purposes. However, even with permission, A-1 Medical, Inc. is still required to limit such uses or disclosures to the minimal amount of personal health information that is reasonably required to provide those services or complete those activities.

*Examples of treatment activities include: The provision, coordination, or management of health care and related services by health care providers, consultation between healthcare providers relating to the patient or the referral of a patient for health care from one healthcare provider to another.*

*Example of payment activities include: Billing and collection activities and related data processing, actions by a health plan or insurer to obtain premiums or to determine or fulfill its responsibilities for coverage and provision of benefits under its health plan or insurance agreement, determination of eligibility or coverage, adjudication or subrogation of health benefit claims, medical necessity and appropriateness of care reviews, utilization review activities and disclosure to consumer reporting agencies of information relating to collection of premiums or reimbursement.*

*Examples of healthcare operations include: Development of clinical guidelines, contacting patients with information about treatment alternatives or communications in connection with case management of care coordination, reviewing the qualifications of and training healthcare professionals, underwriting and premium rating, medical review, legal services, auditing functions and general administrative activities such as customer service and data analysis.*

**• As Required By Law**

A-1 Medical, Inc. may use or disclose personal health information to the extent that such use or disclosure is required by law and the use or disclosure complies with and is limited to the relevant requirements of such law. (Example: Public health activities including, preventing or controlling disease or other injury, public health surveillance or investigations, reporting adverse events with respect to food or dietary supplements or product defects or problems with the FDA, medical surveillance of the workplace or to evaluate whether the individual has a work-related illness or injury in order to comply with Federal or State law. Disclosures regarding victims of abuse, neglect, or domestic violence including, reporting to social services or protective service agencies. Health oversight activities including audits, civil, administrative or criminal investigations, inspections, licensure or disciplinary actions, or civil administrative proceedings in response to a court order or administrative tribunal, a warrant, subpoena, discovery request or other lawful process. For the nation's security and intelligence activities, protective services of the President and others and to correctional institutions and other law enforcement custodial situations.)

**• All Other Situations, With Specific Authorization**

Except as otherwise permitted or required, as described above, A-1 Medical, Inc. may not use or disclose personal health information without written authorization. Further, A-1 Medical, Inc. is required to use or disclose personal health information consistent with the terms of authorization. The PATIENT may revoke authorization to use or disclose any personal health information at any time, except to the extent that A-1 Medical, Inc. may have taken action in reliance on such authorization, or it provided the authorization as a condition of obtaining insurance coverage, other law provides the insurer with the right to contest a claim under policy.

**Rights with Respect to Personal Health Information**

Under HIPAA, the Patient has certain rights with respect to personal health information. The following is a brief overview of rights and A-1 Medical, Inc.'s duties with respect to enforcing those rights.

**• Right to Request Restrictions on Use or Disclosure**

The PATIENT has the right to request restrictions on certain uses and disclosures of personal health information about themselves. The PATIENT may request restrictions on the following: Disclosures to family members, relatives, or close personal friends regarding personal health information, payments related to healthcare, of your location, general condition or death. While A-1 Medical, Inc. is not required to agree to any requested restriction, if A-1 Medical, Inc. agrees to a restriction, A-1 Medical, Inc. is bound not to use or disclose personal health information in violation of such restriction, except in certain emergency situations. A-1 Medical, Inc. will not accept a request to restrict uses or disclosures that are otherwise required by law.

**• Rights to Inspect and Copy Personal Health Information**

The PATIENTS' designated record is a group of records that A-1 Medical, Inc. maintains that may include: medical records, billing records, enrollment, payment, claims, case management or other. The PATIENT has the right of access in order to inspect and obtain a copy of their personal health information contained in their designated record set, except for: psychotherapy notes, information compiled in reasonable anticipation of, or for use in a civil, criminal, or administrative action or proceeding. A-1 Medical, Inc. does require written request for inspection and/or copies of personal health information. A-1 Medical, Inc. does require adequate time for locating and making such information available to the patient. A-1 Medical, Inc. may charge a reasonable cost-based fee for copying and postage if mailed. A-1 Medical, Inc. does reserve the right to deny request for access to health information and if so, A-1 Medical, Inc. will provide a written denial specifying the legal basis for denial, a statement of rights and a description of how to file a complaint with us.

**• Complaints**

The PATIENT may file a complaint with A-1 Medical, Inc. and with the secretary of DHHS if believed that their privacy rights have been violated. The PATIENT may submit their complaint in writing by mail or call the privacy office with A-1 Medical, Inc. at 843-661-2166. A complaint must name the entity that is the subject of the complaint and describe the acts or omission believed to be in violation of the applicable requirements of HIPAA or this Privacy Policy. A complaint must be received by A-1 Medical, Inc. or the Secretary of DHHS within 180 days of when known or should have been known act or omission occurred. The PATIENT will not be retaliated against for filing any complaint. The patient may also contact JCAHO (The Joint Commission on the Accreditation of Healthcare Organizations) if the patient's complaint is not satisfied in a timely manner. You may reach JCAHO at 800-994-6610.

**• Amendments To This Privacy Policy**

A-1 Medical, Inc. reserves the right to revise or amend this Privacy Policy at any time. These revisions or amendments may be made effective for all personal health information we maintain even if created or received prior to the effective date of the revision or amendment. A-1 Medical, Inc. will provide the PATIENT with the notice of revisions or amendments mail within 60 days of the effective date of such revision, amendment or change.