



PRIVACY NOTICE (Gramm-Leach-Bliley Act)

Colorado HealthOP (“the Plan”), as an insurer, is required to give this Privacy Notice to you under the Gramm-Leach-Bliley Act (P.L. 106-102) (“the Act”). This Privacy Notice informs you of the types of nonpublic personal financial information that we collect from you and about you from others. In addition, we have the obligation to give you notice of the ways in which we use this information in the process of providing health coverage to you. This Privacy Notice is in addition to the Notice of Privacy Practices that you receive to inform you of our use of your protected health information (PHI) pursuant to the Health Insurance Portability and Accountability Act (HIPAA). Both notices are available at www.cohealthop.org.

What is Nonpublic personal financial information?

“Nonpublic personal financial information” means personally identifiable financial information and any lists, descriptions or other groupings of members that is obtained through the use of personally identifiable financial information that is not publicly available. It does not include health information, publicly available information or any list, description or other grouping of consumers that is obtained without using personally identifiable financial information.

Example: Lists of member names and addresses grouped by use of Plan ID or account numbers.

“Personally identifiable financial information” means any information (a) that you provide to the Plan to obtain health coverage from the Plan; (b) that the Plan generates about you during the period of your coverage by the Plan; and (c) that the Plan receives from third parties about you in connection with your health coverage. Personally identifiable financial information does not include health information.

Examples: Information collected from your application or enrollment form, your use of the Plan’s website, your correspondence with the Plan; account balance information.

The Plan Collects Nonpublic Personal Financial Information From You

The Plan collects nonpublic personal financial information regarding you, both at the time of your enrollment in the Plan and during the period you are covered by the Plan (a) from your application form (e.g., social security number, age and contact information); (b) when you pay your premiums (e.g., banking information); (c) when you submit changes in dependents and contact information; and (d) when you submit claims.

The Plan Collects Nonpublic Personal Financial Information From Other Sources

The Plan may collect information from other sources, such as your health care providers who submit bills to us for the services they provide to you, and other insurance companies for coordination of benefits purposes. We also collect information from your employer in a group plan regarding your employment status and changes in family and dependent status.

The Plan does not collect information from any consumer credit reporting agency or any other third party commercial database.

The Plan Uses Nonpublic Personal Financial Information to Assure Timely and Appropriate Coverage for You and Your Family

The Plan may disclose nonpublic personal financial information in the following ways to ensure timely, effective and appropriate health care to you and your family. All of the following disclosures of your information are permitted by the Act without further notice to you:

- To third parties that perform business, professional or insurance functions for us, such as claims processing, care management, quality management, underwriting, legal and actuarial services

- To third parties that help us determine member eligibility or detect or prevent criminal activity, fraud or misrepresentation in connection with an insurance transaction
- To health care providers to verify coverage or benefits or conduct an audit to verify treatment
- To an insurance regulatory authority, as part of required audits
- To respond to certain court orders, subpoenas or other legal process
- To law enforcement, as allowed by law, to protect Colorado HealthOP and prevent or prosecute fraud
- As otherwise permitted or required by law
- To group policyholders for the purposes of reporting claims experience, conducting audits of the Plan or in follow-up to an authorized inquiry into the status of a claim

The Plan does not disclose nonpublic personal financial information to third parties for marketing purposes without your prior authorization.

Your Right to Opt Out of Disclosure of Nonpublic Personal Financial Information

The Plan does not disclose nonpublic personal financial information to nonaffiliated third parties for purposes not related to the administration of the Plan. To the extent that the Plan should determine at some future time that any such disclosure is necessary, you will receive a revised privacy notice, and you will be offered the opportunity to opt out of any such disclosure by contacting the Plan by letter, email or telephone.

The Privacy Policies of the Plan

The Plan has policies and procedures in place to protect the confidentiality of your nonpublic personal financial information. All third parties with whom we contract are required to maintain the confidentiality of your personal information shared with them, including nonpublic personal financial information. They are also prohibited from redisclosing any confidential information, including nonpublic personal financial information, to any other persons without our express written consent. We would give such consent only if required to do so by law or if the redisclosure were necessary to the administration of your health coverage. Generally, the Plan requires that only persons who have a need to know your nonpublic personal financial information for their specific job duties may have access to this information.

We have the right to change our policies and procedures at any time. We will notify you if we make material changes to our policies and procedures regarding our use of your nonpublic personal financial information.

What If There is a Conflict Between This Privacy Notice and the Notice of Privacy Practices?

If there is a conflict between this Privacy Notice and our HIPAA Notice of Privacy Practices, the document that provides you greater privacy or greater rights with respect to your personal information will determine how we use or disclose your personal information.

Where You Can Get More Information

If you would like more information regarding how we collect nonpublic personal financial information, how we use such information or how we protect such information, please contact Chief Compliance Officer at 720-627-8900 or complianceatCOHealthOP.org.