



PRIVACY POLICY

The purpose of this policy is to protect and secure the confidential and personally identifiable information of employees of the Archdiocese and its Affiliates (defined as any entity that is subject to the administrative authority of the Archbishop of Cincinnati under Canon Law.) The Archdiocese of Cincinnati and its Affiliates expect all employees, clerics, volunteers, trustees, advisory committee members, directors, officers, and third parties to comply with this policy and with state and federal laws governing protection of employee information. This policy communicates how employee information will be gathered, used, and disseminated. It demonstrates the “reasonable measures” the Archdiocese of Cincinnati and its Affiliates will take to protect against unauthorized access to or use of Personally Identifiable Information (“PII”). Increasingly, employers are being held liable for any harm their employees suffer because of a workplace breach of their confidential information.

INFORMATION COLLECTED

The Archdiocese of Cincinnati and its Affiliates collect information about employees and their dependents in order to provide employees with products and services they have requested. Examples of personally identifiable information that may be collected include: 1) Information received from employees on applications or other forms. Examples of this information include name, address and Social Security number, date of birth, dependent information, employment information and medical information and 2) Information obtained from transactions from employees, affiliates, or others such as healthcare providers, other insurers, third-party administrators, vendors, consultants, and government agencies. Examples of this information include health care claims, life insurance claims, medical history, eligibility information, payment information, coordination of benefits information and appeal information. The Archdiocese of Cincinnati and its Affiliates require employees to provide PII only with their knowledge and consent. Employees are free to review and restrict the use of their confidential information.

SECURITY OF INFORMATION

The Archdiocese of Cincinnati and its Affiliates store employees’ PII in secure databases, and will take appropriate physical, electronic and procedural safeguards to protect PII against unauthorized access and use. Access to an employee’s PII will be restricted to employees who need to know to provide products and services to the employee.

DISCLOSURE OF INFORMATION

The Archdiocese of Cincinnati and its Affiliates may collect, use and share the PII of employees and their Protected Health Information (“PHI”) as required by law and the HIPPA Privacy rule. The PHI can be shared with third party administrators who sponsor group insurance plans for medical, dental, life, accidental death and dismemberment, long term disability, flexible spending account, pension, unemployment, Workers Compensation and property and liability. The PHI can be shared with health care providers such as doctors, dentists, pharmacies, and hospitals. It can be shared for health oversight activities, for judicial or administrative proceedings with public health authorities, for law enforcement





reasons, and with coroners, funeral directors or medical examiners. The PHI can also be shared with organ donor groups for certain reasons, for research, and to avoid a serious threat to health or safety. It can be shared for special government functions, to alert proper authorities in cases of neglect, domestic violence or other crimes.

PROTECTED HEALTH INFORMATION

The Archdiocese of Cincinnati and its Affiliates may use and share (PHI) to manage an employee's account or benefits; to pay claims through the plan. For example, the Archdiocese keeps information about an employee's premium and deductible payments. The Archdiocese may give information to a Dr.'s office to confirm benefits

The Archdiocese and its Affiliates may use and share PHI for employee care operations. For example, the Archdiocese may use PHI to review the quality of care and services an employee gets. The Archdiocese may also use PHI to provide an employee with case management or care coordination services for conditions of like asthma, diabetes or traumatic injury. It may share PHI to an employee's Dr. so they can treat the employee.

The Archdiocese must give the employee access to his/her own PHI. The Archdiocese may contact the employee to let the employee know about treatment options or other health-related benefits and services. The Archdiocese may give an employees' PHI to a family member, friend or other person if approved by the employee.

Employees have the right to access their medical records and to request that the Archdiocese restrict other access to their confidential information. The Archdiocese may use and disclose employee members' information for routine purposes, such as treatment, payment and health care operations. Employees have the right to amend certain information and to obtain an accounting of certain disclosures

EXPECTATIONS OF THIRD PARTIES

The Archdiocese of Cincinnati encourages third parties to take reasonable precautions to protect member information and maintain privacy in all settings. Archdiocesan contracts with physicians and other providers must state expectations about confidentiality of member information and records. Providers functioning in peer review capacity must specifically address and uphold the confidential nature of all patient medical information.

NON-PERSONALLY IDENTIFIABLE INFORMATION

The Archdiocese of Cincinnati and its Affiliates may share aggregated non-personally identifiable information with third parties for various purposes. The Archdiocese of Cincinnati and its Affiliates obligations under this Privacy Policy do not apply to any information or data that: (a) is not identifiable as the employees; (b) is or becomes entirely in the public domain; (c) was known to the Archdiocese of Cincinnati and its Affiliates prior to its access to the information or data; (d) received lawfully from a third party through no breach of any obligation of confidentiality owed to employee; and/or (e) created by the





Archdiocese of Cincinnati and its Affiliates independently of its access to, or use of, employee personally identifiable information.

USE OF ARCHDIOCESAN TECHNOLOGY RESOURCES

The Archdiocese of Cincinnati and its Affiliates may provide technology resources and aggregate data to third parties. However, the Archdiocese of Cincinnati and its Affiliates will not disclose an employee's PII in providing aggregate data to third parties.

OPT-OUT

Employees have the option to opt out of being contacted by or receiving information from the Archdiocese of Cincinnati, its sponsors, affiliates and/or partners, and to choose how the Archdiocese of Cincinnati uses their personally identifiable information. Employees may also review, update and correct their personally identifiable information. Employees may exercise these options by sending an e-mail to their supervisor.

LINKS TO OTHER SITES

The Archdiocese of Cincinnati and its Affiliates are not responsible or liable for the privacy practices or information gathering, use or dissemination practices of other sites that may be linked to its sites. Employees will need to review the privacy policies or statements of these other sites to understand their information gathering, use and dissemination practices.

COMPLAINTS

If an employee thinks his/her privacy has not been protected, the employee may use the Employee Problem Solving Process to file a complaint.

ENFORCEMENT

The Archdiocese of Cincinnati, its Affiliates and their respective administrators intend to enforce the policy set forth here and expect all employees, clerics, volunteers and third party administrators to comply. Failure to comply with any of the provisions of the Privacy policy will be grounds for discipline, up to and including termination if an employee; removal from position if a volunteer; or, canceling the contract if a third party.

The Archdiocese of Cincinnati and its Affiliates reserve the right to make changes to this policy at any time and at its sole discretion, and interpret and administer the policy in light of changing circumstances and events.

