

BCBSA EVIDENCE POSITIONING SYSTEM PRIVACY POLICY

Effective Date: April 25, 2017

The Blue Cross and Blue Shield Association (“**BCBSA**,” “**we**” or “**us**”) owns and operates the Evidence Positioning System web site (the “**Site**”). The purpose of this Privacy Policy is to inform authorized users (“**End User**” or “**you**”) how BCBSA handles the information collected through the use of the Site. BCBSA’s privacy policies may differ at its other web sites.

THE INFORMATION WE COLLECT

Our web servers automatically capture your domain name, the IP address of the web page from which you enter the Site, the pages you visit on the Site, and the amount of time you spend at the Site. We collect user profile information upon registration to the Site, which enables you to use interactive features of the Site, to receive information from us or our independent member Blue Cross and Blue Shield companies (“**Blue Plans**”), or other interested third parties. The information we collect through the Site is not subject to the Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”). Information that you provide voluntarily will be maintained as long as BCBSA deems appropriate to fulfill the purpose for which you provided the information or other purposes in accordance with this Privacy Policy or until you ask us to remove it. Personally identifiable information voluntarily provided by you may be retained indefinitely for the purposes described in this Privacy Policy. Other than to fulfill a request from you or as otherwise set forth in this Privacy Policy, we won’t sell, rent or share any personally-identifiable information you provide without your consent.

- We won't send you any unsolicited e-mail ("spam").
- No personally-identifiable information collected at this Service will ever be used to affect your health insurance coverage by or premiums paid to a Blue Cross and Blue Shield Company.

USE OF THE INFORMATION THE SITE GATHERS/TRACKS

Any personally identifiable information you give us will be used to support the Site, to assist in the development of additional programs, services, or products, or as otherwise described in this Privacy Policy and the Terms and Conditions. You specifically consent to let us use your personally identifiable information, including, but not limited to, your e-mail address and search history, which may be shared with Blue Plans, other End Users, or other interested third parties.

We may use third-party vendors to perform certain services on behalf of us or the Site, such as hosting the Site, designing and/or operating the Site’s features, tracking the Site’s activities and analytics. We may provide these third-party vendors with access to your information or they may directly collect your information when servicing the Site. Third-party analytics and other service providers may set and access their own tracking technologies on your device and they may collect or have access to

information about you, including your personal information. We are not responsible for the actions or omissions of any third-party vendor.

To the fullest extent permitted by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate to: (a) protect or defend the rights, safety or property of BCBSA, any Blue Plan, or third parties (including through the enforcement of this Privacy Policy, and other applicable agreements and policies); (b) comply with legal or regulatory obligations or requests (e.g., pursuant to law enforcement inquiries, subpoenas or court orders); (c) enforce the Terms and Conditions; and (d) protect the rights, property or safety of BCBSA, a Blue Plan, an End User or third party. To the fullest extent permitted by applicable law, we have complete discretion in electing to make or contest such disclosures without notice to you.

This Site may also uses the tool “Google Analytics” to collect data on the use of this Site and help us better understand our visitors’ usage. To access Google Analytics’ privacy policy and/or opt out of being tracked by Google Analytics, please visit <http://tools.google.com/dlpage/gaoptout>.

COOKIES

When you visit the Site, we may place a temporary “session” or a permanent cookie on your computer that will allow us to customize and enhance your experience at the Site, make improvements to the Site, or to report Site activity. Our session cookies are not permanently stored on your computer and expire when you leave. Permanent cookies are issued only to End Users who link the Site from a search engine and are used only to permit BCBSA to attract qualified users to the Site.

SECURITY

BCBSA is committed to taking appropriate measures to protect your privacy against unauthorized disclosures. BCBSA’s third party web vendor uses a variety of secure techniques designed to protect your information. While safeguards have been implemented, you should be aware that Internet security technology changes rapidly. As such, we cannot guarantee that we can protect your information or that the Site’s security measures are failsafe or not subject to circumvention or unauthorized intrusion. You should also be aware that, despite our reasonable efforts, factors beyond our control may result in disclosure of your information.

THIRD-PARTY LINKS

Portions of the services and functionality available on the Site may contain links to other third party web sites, which you may access. These third party web sites have their own privacy policies, and you should

review those privacy policies before following those links. We cannot control the information disclosed at such third-party web sites or how information is used.

CHILDREN'S PRIVACY

We do not intend that the Site will be accessed or used by children under the age of thirteen (13), and such use and access is prohibited. By using the Site, you represent that you are at least eighteen (18) years of age. In the event that we become aware that we have collected personal information from any child under the age of thirteen (13) years, we will dispose of that information in accordance with the Children's Online Privacy Protection Act and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with personal information without your consent, please contact us at Webmaster via e-mail at bcbswebmaster@bcbsa.com, and we will take reasonable steps to ensure that such information is deleted from our files.

CHANGES TO THIS PRIVACY POLICY

Your use of the Site constitutes your acceptance of the terms of this Privacy Policy, as may be amended or revised by us. We may update or make changes to this Privacy Policy from time to time and will advise you of any changes or updates by posting a revised Privacy Policy on the Site. The date of the latest revisions will be noted above at the beginning of this Privacy Policy. Please consult the Site and the Privacy Policy regularly for any changes or updates.

NOTICE FOR END USERS OUTSIDE OF THE UNITED STATES

You should be aware that the United States and other countries have not harmonized their privacy regulations. Because the Site is intended specifically for End Users in the United States, we have written this Privacy Policy to satisfy United States regulations. By using the Site and the services available on the Site, you agree to the level of privacy protection set out in this Privacy Policy.

If you have any questions or comments or receive any unwanted e-mail from the Site, please contact the Webmaster via e-mail at bcbswebmaster@bcbsa.com. Evidence Positioning System ("Site") is a technology based system that allows quick, efficient medical policy comparisons within BCBS system and with national competitors. Through EPS, Plans will demonstrate market leadership by providing early notification or immediate feedback to accounts on medical policy matters. This Site and BCBSA do not determine medical policy, provide health insurance benefits information, or adjudicate coverage claims for any Blue Plan; do not provide medical, legal, or financial advice; and are not intended for consumer use. Each local Blue Plan, as an independent entity, determines its own medical policies, benefits, and adjudicates its own members' claims, and may accept or reject information on this Site in its own

discretion. Neither BCBSA nor any Blue Plan recommends, endorses, warrants or guarantees, nor are they responsible for damages based on any program, provider, product, or service whose information may appear on this Site. Site content expresses the opinion of BCBSA and/or the respective authors cited therein, not those of any Blue Plan. For details, see our Terms of Use and Privacy Policy.

The information on the Site comes from a variety of sources. BCBSA does not warrant the accuracy or completeness of the information provided by third parties, or recommend, endorse, warrant or guarantee, any program, provider, product, or service whose information may appear on this Site. The views and opinions expressed in documents provided by third parties are those of the authors cited therein, and do not necessarily reflect the views or opinions of BCBSA, nor those of any Blue Plan. Such content and other information made available through Site is for educational and information purposes only.

Evidence Positioning System is a proprietary application that offers general information, only, in “as is” condition. Evidence Positioning System does not provide medical, legal, or financial advice. For medical issues, check with your healthcare provider. Neither BCBSA nor any Blue Cross and/or Blue Shield Plan recommends, endorses, warrants, or guarantees, nor are they responsible for damages based on any program, provider, product, service, or community asset whose information may appear on CHM Hub’s website. For details, see our Terms of Use and Privacy Policy.



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