



TO: Flexible Benefit Plan Participants

DT: January 1, 2004

RE: **Notice of Privacy Policy and Practices**

Purpose of this Notice

Elkin & Associates, LLC respects the privacy of personal information and understands the importance of keeping this information confidential and secure. This Notice describes how we protect the confidentiality of the personal information we receive. Our practices apply to current and former employees and customers.

Types of Personal Information We Collect

As a Third Party Administrator, we collect the minimum necessary personal information to adjudicate claims for reimbursement under certain employee benefit plans. The documentation required during the adjudication process may include Protected Health Information (PHI).

How We Protect Personal Information

We treat all personal information and PHI securely and confidentially. We limit access to personal information and PHI to only those persons who need to know that information to provide support services to our customers. These persons are trained on the importance of safeguarding this information and must comply with our procedures and applicable laws. We meet strict physical, electronic and procedural security standards to protect personal information and PHI, and we maintain internal procedures to promote the integrity and accuracy of that information.

Disclosure of Personal Information

We may disclose information to affiliated or non-affiliated entities or individuals as permitted by law. Entities with whom we may disclose information as permitted by law include our attorneys, accountants and auditors, a customer's authorized representative, healthcare providers, third party administrators and law enforcement.

Individual Rights to Access and Correct Personal Information

We have procedures for an authorized representative of the information to have access to the personal information that we collect, and other than information we collect in connection with, or in anticipation of, a lawsuit or legal claim, we will make this information available to the user upon written request.

We have procedures in place to ensure the integrity of our information and for the timely correction of incorrect information.

Further Information

We may amend our privacy policy from time to time. In accordance with applicable law, we will send our current customers a Notice describing our privacy policy and practices at least once a year. It will also be available upon request and can be viewed online at www.elkinassociates.com. If you have any questions about this Notice, please contact our Chief Privacy Officer at Elkin & Associates, LLC, PO Box 35470, Charlotte, NC 28235 or by calling 704-334-5517.

