

Special Notice Regarding Privacy Protections Related to Race, Ethnicity, Language, Gender Identity and Sexual Orientation



A. We value your trust and are committed to the responsible management, use, and protection of your personal identifying information. This includes data related to your race, ethnicity, language, gender identity, and sexual orientation. We have implemented policies and procedures to ensure the privacy and security of your information. **Controls for physical and electronic access:**¹

- 1) The company has physical access controls for facilities where these data elements are stored or processed, including the use of door locks restricted to authorized personnel only.
- 2) Associates and contingent workers must keep physical copies of these data elements in locked areas.
- 3) Company devices (e.g., laptops), hardware, and media (CDs, portable drives, etc.) containing these data elements are subject to asset inventory and management, including identification of location and ownership assignment.
- 4) Company devices and hardware containing these data elements must be protected from physical loss or theft.
- 5) When company devices and hardware assets containing these data elements are decommissioned, they must be returned to the IT Asset Management secure storage area and are subject to disposal processing, including device sanitization and destruction.
- 6) Systems used to process and store have implemented access controls to restrict electronic access based on job responsibilities (role-based access control).
- 7) User access to systems used to process and store data must be authorized prior to access being provisioned.
- 8) Systems used to process and store have controls to identify and authenticate users.
- 9) User access to systems used to store these data elements must be removed by Enterprise Information Security or delegated system owners upon notification of termination of employment or changes in job responsibilities.

B. Permissible and impermissible use of the data.²

- 1) The company may use this data for the following:
 - a. Ensure customers get the care they need.
 - b. Create programs and products to achieve the company's mission and objectives.
 - c. Improve communication between our staff, customers, and other partners (e.g., providers, etc.).
 - d. Address health care disparities.
- 2) The company will not use this data for the following:³
 - a. Denial of coverage / benefits.
 - b. Pay claims.
 - c. Underwriting or determining cost or eligibility for benefits.
 - d. Determine health care or administrative service availability or access.

¹ 2024 NCQA HE 2 G (1)

² 2024 NCQA HE 2 G (2)

³ 2024 NCQA HE 2 G (3)