

Connolly

Adherence to HIPAA Standards Policy

Connolly takes the privacy and security of its clients' business information very seriously. Its commitment to privacy and security is demonstrated by the many precautions taken to protect client information on Connolly information systems from unauthorized use or disclosure.

Connolly has implemented extensive privacy policies and procedures.

Connolly has adopted privacy policies and procedures to protect the confidentiality of client information. Given its role as a key provider of services to the U.S. health insurance industry, Connolly's policies and procedures address the privacy implications of the Federal Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Additionally Connolly complies with European Data Protection legislation. Connolly employees receive comprehensive training regarding these policies and the principals of confidentiality. Employees are instructed that access to client information is permitted strictly on a "need-to-know" basis.

Connolly has implemented stringent security policies and procedures.

Connolly protects client information stored on its information systems from unauthorized access using commercially available computer security products (e.g., firewalls), as well as carefully developed security procedures and practices. Examples of Connolly's security precautions include:

- Password-driven access controls for Connolly's information systems
- Periodic internal security audits
- Background checks for new employees
- Security awareness training for employees
- Physical safeguards to prevent unauthorized access to Connolly's data centers, including keycard access controls and video surveillance

Connolly has also engaged an independent security consultant to provide annual security audits for Connolly. These audits allow Connolly to continue to refine its security procedures and maximize the security of client business information.

How to contact Connolly regarding current privacy and security practices.

Questions about privacy, security, or information handling practices should be directed to Connolly's Privacy Officer at email address: HIPAA@connolly-consulting.com

Connolly reserves the right to periodically update this document to reflect any changes in Connolly's privacy policies or security procedures.