

## **NOTICE OF PRIVACY PRACTICES**

**THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN OBTAIN ACCESS TO THIS INFORMATION. PLEASE REVIEW CAREFULLY.**

**The effective date of this notice is Dec 3, 2020**

The terms of this Notice of Privacy Practices (“Notice”) apply to Transdev, its affiliates, and its employees. Transdev will share protected health information of members as necessary to carry out services, payment, and operations as permitted by law.

We are required by law to maintain the privacy of our member’s protected health information and to provide members with notice of our legal duties and privacy practices with respect to protected health information. We are required to abide by the terms of this notice for as long as it remains in effect. We reserve the right to change the terms of this notice as necessary and to make a new notice of privacy practices effective for all protected health information maintained by Transdev. A copy of any revised Notice of Privacy Practices or information pertaining to a specific State law may be obtained by mailing a request to the Privacy Officer at the address shown at the bottom of this notice.

### **OUR RESPONSIBILITIES TO PROTECT YOUR PERSONAL INFORMATION**

Under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Transdev must take measures to protect the privacy of your personal information. In addition, other state and federal privacy laws may provide additional privacy protection. Examples of your personal information include your name, Medicaid or Medicare ID, Address, Phone Number, medical transportation records, and claims information.

Transdev protects your personal information in a variety of ways. For example, we authorize access to your personal information by our employees and business associates only to the extent necessary to conduct our business of scheduling your medical transportation request and submitting claims for reimbursement. We take steps to secure our business offices and electronic systems from unauthorized access. We train our employees on our written confidentiality policy and procedures and employees are subject to discipline if they violate them. Our privacy policy and practices apply equally to personal information about current and former members; we will protect the privacy of your information even if you no longer receive services through us.

We are required by law to:

- Maintain the privacy and security of your protected health information;
- Provide this Notice explaining our duties and privacy practices regarding your personal information; and
- Notify you following a breach of your unsecured personal information.

## HOW WE COLLECT YOUR PERSONAL INFORMATION

Transdev collects personal health information from state, government, health insurance companies, and from you. Your personal information may be collected in the form of written or electronic records or through spoken words via phone, internet, or using our mobile application. For example, we receive a Medicaid/Medicare eligibility file from your health insurance provider to determine eligibility for transportation services. Additionally, we collect personal health information verbally from you when you request transportation.

## HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION

**Operations:** We may use and disclose personal information for our operations. For example, we may disclose personal health information to conduct quality assessment and improvement activities, or to engage in case management for members with life sustaining medical conditions.

**Business Associates:** We may disclose your personal information to our Business Associates. These are entities or individuals that are not employed by us but perform transportation services or payment activities on our behalf which require that the Business Associate create, receive, maintain, or transmit your personal information. We must have contracts with our business associates that require them to maintain the confidentiality of your personal information. For example, we provide your medical transportation trip request information to our subcontracted transportation providers so they can pick you up and take you to your medical appointment.

**Health Plan Sponsor:** We may disclose personal information about you to the health plan sponsor through which you receive health benefits to permit the plan sponsor to perform plan administrative functions.

**Service Reminders:** We may use your personal information to contact you via phone, text notification, or through our mobile application to confirm your upcoming transportation request.

**Payment:** We may use and disclose personal information so that we can process medical transportation claims.

**As required by law:** We may use or disclose your personal information when required by federal, state or local law. For example, we may disclose personal information to a health oversight agency, to include the Secretary of the Department of Health and Human Services for activities such as audits, investigations, or related to licensure.

## YOUR RIGHTS REGARDING PERSONAL INFORMATION

When it comes to your personal health information, you have certain rights. This section explains your rights regarding your personal information we maintain for you.

**Request a copy of your member record:** You have the right to ask to see or get an electronic or paper copy of your medical record and other health information we have about you. We will provide a copy or a summary of your health information, usually within 30 days of your request.

**Request to correct your medical record:** You have the right to ask us to correct health information about you that you think is incorrect or incomplete. If we are not able to accommodate your request, you will receive a notice in writing within 60 days explaining why we cannot make the change.

**Restriction Request:** You have the right to request a restriction or limitation on the personal information we use or disclose about you related to operation activities, payment, or disclosures to individuals involved in your care. We will do our best to honor your request unless it violates an applicable law or regulation of our contractual requirements to our client.

**Request for someone to act for you:** You have the right to request that a family member, friend, or medical professional act on your behalf. Transdev will obtain the person's name and relation to you and document their information in your member file.

**Confidential Communications:** You have the right to request that we communicate with you about health matters via alternative methods. For example, you may want us to only contact you on the home phone or via mail to a different address.

**Get a list of disclosures:** You have a right to request a list (accounting) of the dates, times and whom we have shared your health information with for up to six years prior to the date of your request. We will include all the disclosures except for those related to business operations or those related to payments.

**Request a copy of our Privacy Practices:** You have the right to request a copy of this notice. Transdev will accommodate your request to send electronically or through mail, which ever you prefer.

**File a complaint if you feel your rights are violated:** You have the right to file a complaint if you feel we have violated your rights by contacting us directly or with the U.S. Department of Health and Human Services Office for Civil Rights (DHHS) at the addresses and phone numbers below. You will not be penalized if you file a complaint about our privacy practices with us or with DHHS.

Transdev  
C/O Compliance Officer  
720 E. Butterfield Rd, Suite 300  
Lombard, IL 60148  
(800) 225-8800

U.S. Department of HHS  
for Civil Rights  
200 Independence Ave SW  
Washington, D.C. 20201  
(877) 696-6775

#### **CHANGES TO THIS NOTICE**

Should any of our privacy practices change, we reserve the right to change the terms of this notice. The revised Notice would apply to all personal information about you that we maintain. The new notice will be available upon request, and on our website.