

# Change Healthcare Privacy Notice: Assurance Reimbursement Management™ Services

# Effective Date: 08/01/2019

This Change Healthcare Privacy Notice ("Privacy Notice") explains how we use and protect the personal information, including protected health information (PHI), you provide in the course of your use of the Assurance Reimbursement Management<sup>™</sup> (Assurance) products and/or services (collectively, the "Services"). By using the Services, you accept the privacy practices presented in this Privacy Notice. Privacy matters to Change Healthcare, so whether you are new to Change Healthcare or a long-time user, please read this Privacy Notice in full to understand our privacy practices before using the Services or submitting any personal or other information. If you have any questions, please contact us using the contact information at the bottom of this Privacy Notice.

This Privacy Notice applies only to the Services. Change Healthcare's affiliates and subsidiaries may have separate websites, sub-domains, and services through other web, mobile, or cloud platforms which are not subject to this Privacy Notice.

This Privacy Notice is incorporated into our Terms of Use which may be found <u>here</u>. By using the Services, you agree to the terms in this Privacy Notice. If you do not agree with the practices described in this Privacy Notice, please do not use the Services.

## Information Controlled by Your Institution

The Services access personal information, including protected health information (PHI), provided by your health agency or institution ("Institution") in connection with the license of Change Healthcare products or services. Upon licensed access, Change Healthcare will provide you the Services as authorized by your Institution such as access to Change Healthcare's servers and databases and access to information provided by third parties.

## What Information Is Collected through the Services?

Based on your Institution's configuration, the Services collect personal information and other information from a variety of sources, including from you directly as well as through your use of the Services. These data may include:

Information we may collect directly through the Services:

- Personal details (e.g., full name, initials, age, date of birth)
- Contact details (e.g., personal and business phone numbers, email address, postal address, title)
- Account details (e.g., username, password, customer ID, NPI, insurance identification information)

• Protected Health Information (PHI)

## Information we may collect through your use of the Services:

- Technical information collected from your device (e.g., your IP address, browser type, operating system)
- Transaction-related information (e.g., product download ID/name, account contact information, device ID, download frequency/time)
- Information about your usage of the Services
- Device event information (e.g., errors, system activity, hardware settings, the date and time of your request)
- Registration/Profile

## How Does Change Healthcare Use the Information We Collect?

Change Healthcare uses the information we collect to provide, maintain, protect and improve the quality of our services, to develop new products and services, and to protect Change Healthcare and our users.

Information we collect may be used to:

- Activate your access to the Services or related databases
- Identify and authenticate you as a user
- Improve our services (e.g., perform diagnostic services, such as error reporting)
- Perform location verification and identify applicable state regulations
- Perform data analysis and audits
- Communicate with you (e.g., respond to questions you send us)
- Exercise our legal rights (e.g., detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law or our Terms of Use)
- Provide customer and troubleshooting support, detect errors, and debug

We may also de-identify or anonymize the personal information in such a way that it may not reasonably be re-identified and may use this information for any additional purpose allowable by law.

## How Does Change Healthcare Share the Information We Collect?

We may share your information:

- With third parties to provide the contracted Services
- With our service providers, who provide services such as IT and system administration and hosting, research and analytics, customer support and data enrichment for the purposes and pursuant to the legal bases described above

When we share your personal data as described above, we take reasonable steps to ensure that recipients provide the same or equal protection of your personal data as Change Healthcare provides here.

#### **Health Information**

As a key provider of services and technology to the healthcare industry, Change Healthcare has implemented programs to address the privacy and security rules required by applicable regulations, including HIPAA and the Health Information Technology for Economic and Clinical Health (HITECH) Act.

Health information transmitted through the Services is controlled and maintained by your Institution. The Services may store up to a 15-day window of information based on your Institution's settings.

#### Information Security

Change Healthcare takes reasonable and appropriate steps to protect the security of personal data against unauthorized or unlawful access, use, destruction, loss, alteration or disclosure. While we follow generally accepted standards to protect personal data, no method of storage or transmission is 100% secure.

#### **Information Retention**

Your personal information is stored by Change Healthcare on its and/or your Institution's servers, and on the servers of the cloud-based database management services that we and/or your Institution may engage for a period of time consistent with the original purpose of collection.

## **Privacy Notice Changes**

We will update this Privacy Notice from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. If we do, we will reflect this in the "Effective Date" at the top of this Privacy Notice.

## Contact Us

If you have questions or concerns about this Privacy Notice, please contact us via the following:

- **Email:** chiefprivacyofficer@changehealthcare.com (Please include "Change Healthcare Assurance Reimbursement Management™ Privacy Notice" in the subject line.)
- **US Mail:** Change Healthcare, Privacy Office (Attn: Privacy Notice, Assurance Reimbursement Manager), 5995 Windward Parkway, 5<sup>th</sup> Floor, Alpharetta, GA 30005.