

PRIVACY AND CONFIDENTIALITY POLICY

NovaPro Risk Solutions, LP Privacy Statement (compliance with CA HIPPA)

Revised March 10, 2005

At NovaPro Risk Solutions, LP, we value our relationships with claimants and insureds, and share their concerns about privacy. This policy serves to explain how NovaPro treats personal information that is not public. This is information we obtain from claimants, insureds, providers or vendors (“Any Party”), or from other sources when we provide you with our services.

We want Any Party to know that we respect their privacy, and we strive to protect non-public information by implementing the following:

- (1) We do not sell Any Party’s information.
- (2) We do not share Any Party’s information with persons, companies, or organizations outside of NovaPro or our related companies, who might use that information to promote their products and services.
- (3) We expect persons or organizations that we retain to provide services on our behalf to keep Any Party’s information confidential. We also expect those persons or organizations to use that information only to provide the specific services we have asked them to perform.
- (4) We explain to our employees about the importance of protecting Any Party’s information. We have established safeguards (these are physical, electronic and procedural) to protect this information.

With respect to your privacy and information provided, you may find the following procedures helpful to assist you in your understanding.

(1) What we do with Any Party’s information.

We do not sell Any Party’s insurance information to anyone. We do not share this information with companies or organizations outside of NovaPro and its related companies who might use it to promote their products and services. If that practice were to change, we would offer Any Party the means to opt out of this type of information sharing. We do not share Any Party’s insurance information for marketing purposes, and care and control of all such information shall be handled solely for the purpose of assisting us with carrying out our functions with respect to our role as a claims adjuster or third party administrator.

As required or permitted by law, we may provide Any Party’s information to persons or organizations in and outside of NovaPro without prior consent. We may do this to:

- Fulfill a transaction you have requested or authorized.
- Investigate or handle claims.
- Detect or prevent fraud.

- Participate in insurance support organizations. The information in a report prepared by an insurance organization may be retained by that organization and distributed to other persons.
- Comply with lawful requests from regulatory and law enforcement authorities.

These persons or organizations may include:

- Our affiliated entities.
- Companies that perform services on our behalf.
- Independent claims adjusters.
- People who request information pursuant to a subpoena or court order.
- Attorneys we retain to represent claimant's or insured's interests

(2) What kind of information we have and how we obtained it.

Much of the information that we have about Any Party comes directly from them. During the course of handling and administering claims and losses, we may obtain information such as name, contact information, address(es), e-mail address(es), telephone number(s) and social security number. This information may come from a variety of sources, including information obtained from our related companies, the insurance policy, direct communications from Any Party, communications from outside counsel retained to represent an insured, and via discovery on litigated files. We keep file information in the form of a claim file for each loss/claim reported to us for handling.

(3) Ways in which we protect Any Party's information.

We expect any company with whom we share Any Party's information to use it only to provide the specific service we have asked them to perform. Information about Any Party is also available within NovaPro and our related companies. It is available to those people who may need to use it to meet and service the needs of our claimants and insureds. We communicate the need to protect this information to all employees, with special emphasis of this need to those persons who have access to such information. Additionally, we have established physical, electronic, and procedural safeguards to protect your information.

Furthermore, once Any Party's relationship with us ends, their information will remain protected. This protection will be provided according to our privacy practices outlined in this policy.

(4) How Any Party can find out what information we have about them.

You may request to see, or obtain by mail, the information about you in our records. If you believe that our information is incomplete or inaccurate, you may request that we correct, add to, or delete from any disputed information. To fulfill your request, we may make arrangements to copy and disclose your information to you on our behalf. This may be done with the utilization of an outside support organization. You may also request a more complete description of the entities to which we disclose your information, or the conditions that might warrant such disclosures. Please send any of the requests listed above in writing to:

NovaPro Risk Solutions, LP
Attn: Compliance Dept.
401 West "A" Street, Suite 1400
San Diego, CA 92101

Although NovaPro is required to abide by the terms of this policy, we reserve the right to modify the terms of this policy at any time, and the new policy will be effective for Any Party's information in our possession at the time of the change, and any received thereafter. Upon request, we will provide you with a revised policy or you can review the policy by accessing our website at www.novaprорisk.com.