

March 30, 2017

NOTICE OF PRIVACY POLICIES AND INSURANCE INFORMATION PRACTICES FOR

JULIE FOSTER INSURANCE SERVICES
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PURPOSE OF THIS ANNUAL PRIVACY NOTICE

The purpose of this notice is to inform you of Julie Foster Insurance Services' privacy policies and procedures. We protect your nonpublic personal information ("NPI") and protected health information ("PHI") from disclosures that are not allowed by law or restricted or disallowed in this annual Privacy Notice. Julie Foster Insurance Services gives this Notice as a service to all valued customers and to comply with the requirements of the law.

This annual Privacy Notice describes how Julie Foster Insurance Services collects, discloses and protects the personal information we gather about you. We may materially change our privacy policies and procedures, and if we do we will notify you before we make the changes.

OUR PRIVACY POLICIES AND PROCEDURES

1) Categories of NPI and PHI We Collect.

We collect several types of NPI and PHI about you including:

Information that we receive from you on applications and other forms; such as your name, address, social security number, birthdate, dependent information, medical record information, income and beneficiaries.

Your business dealings with our affiliates other companies and us; such as your policy coverage, premiums, claims and payment history. Information from online applications on our website.

2) Permitted Uses and Disclosures Payment :

NPI and PHI may be disclosed to a Covered Entity or Authorized Recipient for the purpose of ensuring payment by that Covered Entity. Payment activities include:

- Obtaining contributions or premiums to determine or fulfill a responsibility for provision of benefits;
- Obtaining or trying to obtain reimbursement for health care services;
- Determining eligibility and coverage, including coordination of benefits and adjudication or subrogation of health claims;
- Risk adjustment based on enrollee status and demographic characteristics;
- Billing, claims management, collection activities, obtaining payment under a contract for reinsurance (including stop-loss insurance and excess loss insurance) and related health care data processing.

3) Permitted Uses and Disclosures: Health Care Operations.

NPI and PHI may be disclosed to a Covered Entity or Authorized Recipient for the purposes of facilitating health care operations. Health care operations means any of the following activities to the extent they are related to administration of health benefit plans:

- Conducting quality assessment and improvement activities;
- Reviewing health plan or administration performance;
- Underwriting, premium rating, or premium negotiation purposes;
- Conducting or arranging for medical review, legal services and auditing functions;
- Business planning and development; and
- Business management and general administrative activities.

4) Categories of Affiliates and Nonaffiliated Third Parties to Whom We Disclose NPI and PHI.

a) Affiliates.

Julie Foster Insurance Services currently has no affiliates.

b) Nonaffiliated Third Parties.

Insurance carriers, HMO carriers, General Agents, Quoting Vendors, Physicians, Dentists.

c) General Types of Businesses.

Health Insurance, Dental Insurance, Life Insurance, Long Term Disability Insurance, Long Term Care Insurance, Section 125 administrators, Claims administrators, COBRA and HIPAA administrators.

5) Former Customers.

Julie Foster Insurance Services does not disclose any NPI or PHI of former customers.

6) Opting Out of Disclosure to Nonaffiliated Third Parties We Market Joint Products With.

If you don't want us to disclose NPI and PHI about you to nonaffiliated third parties, you may tell us so.

This is known as "opting-out". The law requires that we give you notice and an opportunity to prevent disclosure of your NPI and PHI to nonaffiliated third parties. We may share NPI and PHI about you if we do not hear from you within 45 days of receiving our "opt-out notice". We will provide you a postage paid return form to make your selection. However you may opt-out at any time. Your "opt-out" will remain in effect until revoked in writing by you.

7) We Share NPI and PHI With Our Wholly Owned Affiliates.

You may not prevent us from sharing with our wholly owned affiliates.

8) Disclosures Made of NPI and PHI Protected by the Federal Fair Credit Reporting Act.

The law allows us to share non-transactional information you disclosed under the Fair Credit Reporting Act, however, we do not share this information.

9) How We Protect the Confidentiality and Security of NPI and PHI. We protect and safeguard your NPI. We maintain appropriate administrative, technical and physical safeguards to ensure the security, confidentiality and integrity of your NPI and PHI contained in our records.

10) Your Right to Access, Copy Review and Request Correction of NPI and PHI. You have the right to access, copy, review and request correction of any NPI and PHI in our possession. You must make this request to us in writing and we have 45 days to allow you to review your NPI and PHI. If you believe that there is an error in the information, you may request in writing that it be corrected. We have 45 days from receiving the request to make the correction or to inform you as to why we will not make the requested change and the reasons why. If you disagree with the refusal, you may supply us with a concise statement why you disagree and it will be filed with your NPI and PHI.

11) Allowed or Required Disclosure of NPI and PHI Under Specific Exceptions. The law allows or requires us to disclose NPI and PHI in the following situations. You may not prevent our disclosure of your NPI and PHI as authorized by law.

- With your written authorization.
- To a non-insurance entity if it is reasonably necessary for us to properly do our business and the other entity agrees not to disclose the NPI or PHI.
- To an insurance entity if the disclosure helps the receiving party perform an insurance transaction for you or if it is reasonably necessary to detect or prevent criminal activity, fraud or misrepresentation in connection with an insurance transaction.
- To a medical professional in order to:
 1. Verify coverage or benefits, conduct operations or service audits; or
 2. Inform a person of a medical problem they might not be aware of.
- To the Department of Insurance, law enforcement or other governmental entity including an administrative or court order, or as is otherwise required or permitted by law.
- To conduct actuarial or research studies if there are proper safeguards.
- To facilitate the sale of whole or part of an insurance business.
- To a wholly owned affiliate whose only use will be for marketing a financial product or service provided that.

1. No medical or character information may be disclosed.
 2. The person getting the information agrees to use it only for the purposes for which it was intended
- To a nonaffiliated third party for the marketing of a joint financial product or service with us provided that:
 1. The information can only be used by the nonaffiliate for marketing our joint financial product.
 2. You have been given the opportunity to opt-out and have not done so.
 3. No medical information is disclosed.
 - By a consumer reporting agency if the information does not go to an entity.
 - To a group policyholder to report claims experience or do an audit or to a certificate holder or policyholder to inform them of the status of an insurance transaction.
 - To a professional peer review organization to review medical care.
 - To the government to determine eligibility for health benefits.
 - To a lien holder, etc. or any other having a legal interest in an insurance policy to the extent that the disclosure is needed to protect their interest.