

Healthcare Data Exchange fully respects the privacy rights of each individual and only uses an Individual's Protected Health Information (PHI) for the purpose(s) for which it was received, or as required by local, state, or federal laws. HEALTHCARE DATA EXCHANGE receives PHI from our clients, usually *Covered Entities* such as healthcare providers, health plans; or from other EDI trading partners who have similar clients. HEALTHCARE DATA EXCHANGE is an EDI clearinghouse that provides specific transaction and business services associated with treatment, payment, or healthcare operations, which are defined by each contract.

HEALTHCARE DATA EXCHANGE does maintain records of all transactions received or transmitted, which identifies the source of the transaction, the date and time the transaction was received, the type of transaction, where the transaction was delivered, the date and time the transaction was transmitted, and the disposition of the transaction. These records are used for accounting, auditing, and other business purposes and contain no PHI. When translation services are used for transaction processing, the entire source transaction is stored and the resulting translated transaction is stored, which may contain PHI. These records are only maintained to investigate questions or problems that could arise when the resultant translation is questioned or disputed. All these records are securely maintained for seven years and are only used as described in this statement.

In some cases, certain de-identified health information is used in aggregation, meaning only health related data is collected from multiple patients, but no identifying patient information is collected with that health information. This *aggregated data* may be used to provide services to our clients related to their healthcare operations; or when permitted, to provide such information to appropriate health organizations, such as, State or Federal Public Health Departments for certain health studies; or for our own operational and management requirements.

The health information received or stored by HEALTHCARE DATA EXCHANGE is always kept secure to maintain its confidentiality. This information is only accessed by computer programs that are designed to perform certain processing functions for which we received the data; or by authorized technical support staff who must maintain these computer programs and systems; or by our customer support staff while assisting our clients with questions or operational issues.

All HEALTHCARE DATA EXCHANGE associates are required to protect and safeguard the privacy of Protected Health Information they may encounter through the course of their work. All associates of HEALTHCARE DATA EXCHANGE have received privacy and security awareness training. Only those associates who have support responsibilities with a "need to know" to perform their job responsibilities have access to customer data, which may include patient PHI. Their access to this data is controlled and monitored.

HEALTHCARE DATA EXCHANGE has policies and procedures in place to protect and safeguard the PHI received and/or maintained including workforce sanction policies for those who should violate these policies. HEALTHCARE DATA EXCHANGE does not use, sell, or disclose PHI in any way for marketing or other purposes, except as permitted by contract or as required by law.