

Third Party Data Privacy Information

You have the right to view your health information from Blue Cross Complete through websites and mobile apps that are not under Blue Cross Complete's control. The term "app" or "apps" used here means any of these websites or apps.

You can search the internet to find these apps. Once you have found an app that you like, you can look for and choose "Blue Cross Complete" in the app to sign up. If you want to stop from sharing your data with the app, you must do so through the Blue Cross Complete member portal.

Health information shared with an app would include information that Blue Cross Complete has received about you since January 1, 2016. This includes information about:

- Payment requests from health care providers who treated you.
- Your visits with health care providers.
- Your medical tests.
- Clinical data received by Blue Cross Complete while giving case management, care coordination or other care.

The information Blue Cross Complete would share with an app may include information about any diagnosis or care you got for:

- Substance use disorders.
- Mental health conditions.
- HIV/AIDS.
- Other sensitive medical conditions.

IMPORTANT: The app or app that you choose will be able to see and use Blue Cross Complete's health information about you. These apps do not need to protect your health information like Blue Cross Complete does. They do not need to follow HIPAA (the Health Insurance Privacy and Accountability Act) or other health privacy laws.

These app companies only need to follow the privacy policies that they post in their apps and in app stores. These privacy policies should say how these companies will use and share your health data. Before you ask us to send your health data to an app, carefully read the privacy policy for the app and make sure you understand it. You make this request to AmeriHealth Caritas at your own risk.

Things to think about when choosing an app:

- Does the app (and its spot in the app store) link to a privacy policy? If not, we strongly suggest that you do not use the app.
- Will this app **sell or share** my data? If so, with what other companies? Why (for ads or research)?
- How will this app **use** my data? For what purpose?
- Will the app let me limit how it uses, sells or shares my data?
- If I no longer want this app to use my data, what do I need to do?
- If I want the company that runs the app to delete all of my data, what do I need to do?
- How will this app let me know of changes in its privacy practices?
- Will the app save nonhealth data from my device, such as my location?
- What does the company that runs the app do to keep my data safe in the app?
- What impact could sharing my data with this app have on others, such as my family?
- Will I be able to change any wrong data in the app? (Fixing data in the app will not fix it in Blue Cross Complete systems. You would need to contact Blue Cross Complete to make those changes.)
- If I have a problem with the app or want to complain to the app company about it, how do I do that?

If you are not happy with how the app's privacy policy answers these questions, Blue Cross Complete strongly suggests that you **do not use** the app. Your health information may be sensitive. Make sure the app has a clear privacy policy that shows that the app company takes the privacy and security of your data seriously.

Learn more about app privacy and security

Most apps through which you can access your health data from Blue Cross Complete do not need to follow the HIPAA privacy and security rules. They are required to follow only their own privacy policies. If an app does not follow its own privacy policy, you can complain to the <u>U.S. Federal Trade Commission Act</u>. The U.S. Department of Health and Human Services' Office for Civil Rights enforces HIPAA privacy and security rules. Blue Cross Complete must follow these rules. <u>Find out more about your rights under HIPAA</u>. Learn more about how to file a complaint with the OCR.

You may also file a complaint with Blue Cross Complete. Call Member Services at **1**-**800-228-8554** (TTY: **1-888-987-5832**).

Blue Cross Complete of Michigan LLC is an independent licensee of the Blue Cross and Blue Shield Association.