

MEEKER SHARKEY ASSOCIATES LLC d/b/a
MEEKER SHARKEY & HURLEY
PRIVACY POLICY NOTICE
December 2017

Meeker Sharkey & Hurley is committed to our relationship with you. One of our top priorities is to provide you, our client, with outstanding service. In order to do this, we must collect, maintain and use certain personal and financial information about you and your activities with us. We recognize and respect your privacy concerns and expectations about how we use this information. We want you to know about our privacy policies, practices and what we do to protect the information you share with us. Please read this Consumer Privacy Notice carefully and keep it for your records.

Purpose of This Notice

Title V of the Gramm-Leach-Bliley Act (GLBA) and the laws of the State of New Jersey, generally prohibit us from sharing nonpublic personal information about you with a third party unless we provide you with this notice of our privacy policies and practices describing the type of information that we collect about you and the categories of persons or entities to whom that information may be disclosed. In compliance with the GLBA and the laws of this State, we are providing you with this document, which notifies you of the privacy policies and practices of the Meeker Sharkey & Hurley.

Our Privacy Policies and Practices

1. Information we collect:

A. Categories of Information Collected and Sources From Which We Collect It

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others;
- Information we receive from a consumer reporting agency;
- Information we receive from medical records or medical professionals;
- Information we receive from personal interviews with neighbors, friends, associates or other acquaintances.

B. Persons From Whom Information Is Collected

We may collect nonpublic personal information from individuals other than those proposed for coverage.

- An example of this practice would be collecting information from a resident relative or domestic employee.

C. Information From Credit Reports or Investigative Consumer Reports

If you authorize us to do so, we may obtain information about you from credit reports or other investigative consumer reports prepared by third parties at our request. If you authorize us to request such information and we do request such information, you should be aware that:

- You have the right to request to be interviewed in connection with the preparation of such a report.

- Upon request, you are entitled to receive a copy of the report.
- The information obtained from the report prepared by the third party may be retained by the third party and disclosed to other persons.

2. Information we may disclose to third parties:

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

3. Your right to access and amend your personal information:

You have the right to request access to the personal information that we record about you. Your right includes the right to know the source of the information and the identity of the persons, institutions or types of institutions to whom we have disclosed such information within 2 years prior to your request. Your right includes the right to view such information and copy it in person, or request that a copy of it be sent to you by mail (for which we may charge you a reasonable fee to cover our costs). Your right also includes the right to request corrections, amendments or deletions of any information in our possession. The procedures that you must follow to request access to or an amendment of your information are as follows:

To obtain access to your information: You should submit a request in writing to Meeker Sharkey & Hurley, Attn: Privacy Officer P.O. Box 7; Far Hills, NJ 07931. The request should include your name, address, social security number, telephone number, and the recorded information to which you would like access. The request should state whether you would like access in person or a copy of the information sent to you by mail. Upon receipt of your request, we will contact you within 30 business days to arrange providing you with access in person or the copies that you have requested.

To correct, amend or delete any of your information: You should submit a request in writing to Meeker Sharkey & Hurley, Attn: Privacy Officer P.O. Box 7; Far Hills, NJ 07931. The request should include your name, address, social security number, telephone number, the specific information in dispute and the identity of document or record that contains the disputed information. Upon receipt of your request, we will contact you within 30 business days to notify you either that we have made the correction, amendment or deletion, or that we refuse to do so and the reasons for the refusal, which you will have an opportunity to challenge.

4. Our practice regarding information confidentiality and security:

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information. We do not collect financial information (ie: credit card numbers or bank account information) on our website.

5. Our policy regarding dispute resolution:

Any controversy or claim arising out of or relating to our privacy policy, or the breach thereof, shall be settled by arbitration in accordance with the rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction thereof.

6. Reservation of the right to disclose information in unforeseen circumstances:

In connection with the potential sale or transfer of its interests, Meeker Sharkey & Hurley and their affiliates reserve the right to sell or transfer your information (including but not limited to your address, name, age, sex, zip code, state and country of residency and other information that you provide through other communications) to a third party entity that (1) concentrates its business in a similar practice or service; (2) agrees to be the Meeker Sharkey & Hurley successor in interest with regard to the maintenance and protection of the information collected; and (3) agrees to the obligations of the privacy statement.

THE REMAINDER OF THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW TO OBTAIN ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

1. Statement of Our Duties

We are required by the Health Insurance Portability and Accountability Act (HIPAA) of 1996 to maintain the privacy of your personal health information and to provide you with this notice of our privacy practices and legal duties. We are required to abide by the terms of this notice. We reserve the right to change the terms of this notice and to make any new provisions effective to all of the personal health information that we maintain about you. If we revise this notice, we will provide you with a revised notice by mail.

2. Statement of Your Rights

You have a right to know how we may use or disclose your personal health information. This notice informs you of those uses and disclosures. There are certain uses and disclosures of your personal health information that we are permitted or required to make by law without your permission. For all other uses and disclosures, we first must obtain your permission. In addition, you have the following rights:

- a) The right to request that we place additional restrictions on our uses and disclosures of your personal health information (beyond what the law requires), but we are not obligated to agree to any such additional restrictions.
- b) The right to access, inspect and copy the protected information pertaining to you that we maintain in our files about you, and the right to have us correct or amend any information that we create in error.
- c) The right to receive an accounting of the disclosures of your personal health information that we make for purposes other than activities related to your treatment, or our payment functions or other health care operations.
- d) The right to request that you receive communications of personal health information in a confidential manner.

3. Permissible Uses and Disclosures of Protected Health Information

a) **Payment Functions.** We may use or disclose your health information without your permission to carry out activities relating to reimbursing you for the provision of health care, obtaining premiums, determining coverage and providing benefits under the policy of insurance that you are purchasing.

b) **Health Care Operations.** We also may use or disclose your protected health information without your permission to carry out certain insurance-related activities. These activities include using your protected information for underwriting, premium rating, or other activities relating to the creation, renewal or replacement of another contract of health insurance, and ceding, securing or placing a contract for reinsurance of risk relating to claims for health care.

c) **Uses Permitted/Required by Law.** We also may use or disclose your protected health information without your written permission for purposes permitted or required by law.

d) **Authorized Uses.** All other uses or disclosures of your protected health information will be made only with your written permission, and any permission that you give us may be revoked by you at any time.

4. **Complaints About Misuse of Health Information**

You may complain either directly to us or to the Secretary of Health and Human Services if you believe that your rights with respect to our protection of your health information have been violated. To file a complaint with us, you may submit a complaint in writing that includes as many details (such as names and dates) as possible. You will not be retaliated against in any way for filing a complaint.

5. **Contact Person for Filing Complaint or Obtaining Further Information**

Meeker Sharkey & Hurley
P.O. Box 227
Liberty Corner, NJ 07938
Attention: Privacy Officer
908-234-1200