

THE KEMPTON GROUP'S GENERAL PRIVACY POLICY STATEMENT

1. General

Kempton Group is comprised of The Kempton Company, Kempton Group Administrators, Inc., and J. W. Kempton & Associates. These companies are collectively called "The Kempton Group." Although each company is independent of the others, they may share information.

The Kempton Group is committed to protecting your privacy. This privacy policy explains what information we collect about users of our web site and describes how we will use it.

From time to time, our web site may contain links to other sites which are outside our control and are not covered by this privacy policy. If you access other sites using the links provided, your information may be used by the operator of the site in accordance with its privacy policy, which may differ from ours.

This web site is available to the following users:

- **Employer representatives** – those individuals authorized by each employer to access and provide information regarding its employees for purposes of providing health benefits to such persons and their dependents.
- **Individuals** - the employees who are covered under an employer's group health plan and/or their covered dependents.
- **Others** who are interested in learning more about Kempton's services.

2. What information do we collect?

Kempton collects personal information about the employees whose employers utilize a member of Kempton Group to assist in claims administration. The information is collected from the Employer Representative and from individuals who receive benefits in each employer's plan. The personal data collected includes "Health Information" meaning information created or received by a Kempton Affiliate or its agent, in any form or medium, which relates to the past, present or future: physical or mental health or condition of a person, provision of health care services to such person, or the payment for such services.

Kempton does not sell or distribute health information to third parties. Such information is used primarily to enable the claims adjudication functions and to ensure proper administration of the plan.

Group health plans are subject to Federal regulation that requires the plans to protect the confidentiality of your private health information. Under the Health Insurance Portability and Accountability Act of 1996, as amended ("HIPAA"), most group health plans have until April 14, 2004, to comply with these requirements. Group health plans may delegate some of these functions to Kempton. Kempton will comply with these privacy requirements at such time as the group health plan is required to comply with HIPAA.

3. What about cookies?

"Cookies" are small pieces of information that are stored on your computer's hard drive by your browser. Kempton uses cookies to simplify the registration process. Our cookies do not contain any personally identifiable information. Most browsers allow you to turn off the cookie function. If you want to know how to do this please look at the help menu on your browser. You do not need to allow your browser to accept cookies in order to use our service.

4. Security

As required by the Data Protection Act 1998, we follow strict security procedures and take appropriate measures to ensure that the information about you is not damaged or destroyed, or disclosed to a third party without your permission and to prevent unauthorized access to it. This means that we may require you to co-operate with our security checks before we can disclose information to you.

When you submit information in one of our online forms, Kempton uses SSL (Secure Socket Layer) encryption technology to protect the information submitted. This technology protects users from having information intercepted by anyone other than Kempton while it is being transmitted. Kempton works hard to ensure that its systems are secure and that they meet industry standards. Where appropriate, Kempton uses firewalls, encryption technology, user authentication standards (e.g. passwords, user ids) and access control mechanisms to control access to systems and data.

5. Questions.

Any questions regarding the privacy policy applicable to this site, may be sent to webmaster@kemptongroup.com or in writing to

Kempton Group
Box 54889
Oklahoma City, OK 73154-4889

Remember that e-mail you send is not secure.

6. Amendment.

This privacy policy may be amended by Kempton from time to time, solely in its discretion. You will be bound by the terms of the policy as amended. You should also review the "Term of Use" policy.