

**THE KEMPTON GROUP®'S
PRIVACY POLICY
Last Updated: 2/20/2019**

1. General

The Kempton Group® is comprised of The Kempton Company, Kempton Group Administrators, Inc., and J.W. Kempton & Associates. The Kempton Company is the Administrator of Advantage Health Plans Trust. These companies are collectively called "The Kempton Group®." Although each company is independent of the other, they may share information.

The Kempton Group® is committed to protecting your privacy. This Privacy Policy describes The Kempton Group®'s online data collection practices and how we use and protect your personal information. This policy applies only to the information collected on the websites of The Kempton Group® and Advantage Health Plans Trust and does not cover information contained in links to other sites that are not controlled by The Kempton Group®. If you access other sites using links from our websites, your information may be used by the operator of the site in accordance with its privacy policy, which may differ from ours.

By using this Website, you consent to the collection and use of your information in the manner we describe in this Privacy Policy. If you do not agree with these terms, do you use this website.

This website 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: those interested in learning about Kempton's services.

2. What information do we collect?

You may generally use this Website without disclosing personally identifiable information. The only individual data collected from this site include the individual's first name, last name, and ID number. This information is used to confirm that the individual is eligible to utilize this service. Should you have questions and wish to contact us at the email address listed in Section 8, we will also collect your email address and phone number for contact purposes. All other personally identifiable information including Protected Health Information (PHI) is housed in our Secure Benefit Portal, operated by HealthX, a third-party site. Please visit HealthX's Website for information about their Privacy Policy(s).

The Kempton Group®'s use and disclosure of certain information may be subject to the requirements of the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations ("HIPAA") and applicable state law. Any information that you submit that contains Protected Health Information may be subject to HIPAA and applicable state law.

3. How we use the information we collect

We will use personally identifiable information for the purpose for which you provide it including user name, email address, telephone number in order to contact you regarding administrative notices and communications related to the use of the Website or otherwise as you may request. In addition, we may use your personal information in the aggregate in a non-identifiable way in order to better understand the services being provided, how to improve the services, and how to improve the Website.

4. How we disclose the information we collect

Your information may be disclosed to or collected by third-party suppliers and service providers specifically involved in the processing of your information received via the Website and as otherwise necessary to manage our Website. We may also use third party service providers to host the Website and gather and use on our behalf your personal information as contemplated by this Privacy Policy and applicable law. We may also use and disclose your personal information to resolve disputes, internal problems, or enforce our Terms of Use.

We will not otherwise disclose personal information unless The Kempton Group® has reason to believe that disclosing such information is necessary to identify, make contact with, or bring legal action against someone who may be causing harm or interfering with the rights or property of The Kempton Group®, The Kempton Group®'s customers, or others, or where The Kempton Group® has a good faith belief that the law requires such disclosure.

Except as provided in this Privacy Policy, we do not sell, distribute, or release to a third party your personal information without notice to you.

5. Retention of personal information

The Kempton Group® will retain your personal information as needed to fulfill the purposes for which it is collected. The Kempton Group® will retain and use your personal information as necessary to comply with our business requirements and legal obligations. However, we will delete any personally identifiable information in our database upon your request or as otherwise required by law. Upon written request and verification of your identity, we will provide you with your personal information in our possession. Requests for such information should be sent to the contact information below.

6. What about cookies?

“Cookies” refers to electronic data stored by your computer browser. These cookies enable The Kempton Group® to simplify the registration process. Our cookies do not contain any personally identifiable information. Most web browsers automatically accept cookies, but you can disable this function on your web browser. You do not need to allow your browser to accept cookies in order to use our site.

7. Security

As required by the Data Protection Act of 1998, we follow strict security guidelines and take appropriate measures to ensure that your information is not damaged, destroyed, or disclosed to a third party without your permission. We may require you to cooperate with our security checks before we can disclose information to you.

Communication between your browser and portions of our Website containing personally identifiable information are protected with Secure Socket Layer (SSL) encryption. This encryption is to help protect the information while it is being transmitted. Kempton works hard to ensure that its systems are secure and comply with industry standards. Where appropriate, Kempton also uses firewalls, encryption technology, user authentication standards (e.g. passwords, user ids) and access control mechanisms to control access to systems and data.

The Kempton Group® cautions its users that no medium of communication can be guaranteed to be perfectly secure. As a result, we will strive to protect your information using all industry standard encryption technology, but we cannot ensure or guarantee the security of any of the information you transmit to us.

8. Questions

Any questions regarding the Privacy Policy applicable to this site may be sent to customerservice@kemptongroup.com or in writing to:

The Kempton Group®
13431 Broadway Extension, Suite 130
Oklahoma City, OK 73114

9. Amendments

We reserve the right to modify or amend this Privacy Policy at any time. All changes to this policy will be effective immediately upon their posting on the Website. Each user will be bound by the terms of the policy as amended. Please also review the “Terms of Use” Policy.