

Lifeline Systems, Inc.

CarePartners Connect

Privacy Statement

Last updated: 10/7/03

Lifeline Systems, Inc. (“Lifeline,” or “we”) is committed to protecting personal and healthcare information relating to Lifeline subscribers as well as information relating to the companies and employees that operate Lifeline programs. This Privacy Statement describes Lifeline’s policies for handling personal and business information accessible through the CarePartners Connect Internet website at www.carepartnersconnect.com (the “Service”). References to “you” mean CarePartners Connect corporate customers that operate authorized Lifeline programs.

Information We Collect and Use: In order to operate the Service, we need to maintain records that include the name and contact information of your company, the name and contact information (postal address, telephone number, fax number, and e-mail address) for the designated CarePartners Connect Administrator, the names of all authorized CarePartners Connect users, and the user IDs and passwords for all persons authorized to use the Service. We also maintain a list of your subscribers enrolled under a Lifeline Care Plan Agreement. This information is used to facilitate your access to Lifeline subscriber information, to provide the information management features of the CarePartners Connect system, to communicate with you in connection with your use of the Service, and as otherwise specified in this Privacy Statement. CarePartners Connect Administrators and other designated users have access only to information about subscribers to their authorized Lifeline programs.

Cookies: Cookies are small, data files (containing references to user ID information supplied by the user and stored on our secure server) that may write to your hard drive once you have accessed a site. Lifeline uses cookies to enhance navigation and functionality of our CarePartners Connect website, to verify your identity and to customize CarePartners features to your needs and preferences. We may also use cookies to let us know how users are using our website in order to improve the website’s design. Lifeline will not use cookies to track your movement to other websites.

HIPAA Compliance: It is important to recognize that the Health Insurance Portability and Accountability Act (HIPAA), effective April 14, 2003, has established guidelines for handling Protected Health Information (PHI). As a user of CarePartners Connect you are responsible for understanding the HIPAA requirements as they relate to who you allow to access your subscriber information. The information provided by CarePartners Connect is a fundamental part of the Lifeline PER service we provide to your organization and must be treated as PHI as outlined in our Business Associate Agreement. The use and disclosure of the PHI within CarePartners Connect should fit within the allowed uses and disclosures that you have defined within your Notice of Privacy Practices and provided to your subscribers.

Information Sharing: In the normal course of business, Lifeline does not share your subscriber or Program information with any non-Lifeline companies or personnel except for the purpose of operating the Service or performing the Lifeline monitoring service (as authorized in our Business Associate Agreement with your organization.) For example, Lifeline may use contracted Home Service Representatives to support the installation and servicing of customers. (HIPAA requires that any installer who is not an employee sign a Business Associate Agreement before they can access your information). In addition, information may be used or disclosed to satisfy any applicable law, regulation, legal process or government request, to conclude a transfer of Lifeline assets or business operations, or as Lifeline reasonably deems necessary, to protect the rights, property, or safety of itself or others. Lifeline may use or disclose program information as necessary for treatment, payment, healthcare operations, and provision of the services described in the Agreement.

Access: It is important that Lifeline's databases are accurate, complete, and up to date. In order to review or update the information we maintain about you, please email a request to CPCService@lifelinesys.com or an authorized CarePartners Connect Administrator may go to the "User Admin" tab on the CarePartners Connect website.

Choice: Lifeline may occasionally send Administrators information about other features, services, or products that Lifeline believes may be of interest to CarePartners Connect users. Administrators who do not wish to receive such information may opt out by contacting Program Services at CPCService@lifelinesys.com.

Security: We maintain physical, electronic and procedural safeguards to protect your information as well the information of your subscribers, including measures such as off-site storage of the data; physical access to the database is limited and controlled; User ID/password secure access within Lifeline; and audit logs that record access to data files. We employ encryption for transmission of Lifeline data to ensure that program and subscriber data in our care is not misused or accessed without authorization.

You can take steps to maximize your security online and to protect your subscriber's confidential information. NEVER share your password with anyone, and change it periodically as requested. When using CarePartners Connect website, you should always exit by using the "Logout" feature located in the upper right hand corner of every screen, and close the browser window as instructed on the Logout screen.

Questions: For questions regarding this Privacy Statement, send an email to CPCService@lifelinesys.com.