Notice of Privacy Practices

Effective Date: August 12, 2026
This Notice explains how we may use and share your health information. It also explains how you can get a copy of this information. Please read it carefully.

Our commitment to your privacy

Priority Health and its related companies work to keep your protected health information (PHI) private and secure. When you join a Priority Health plan or use covered services, we may collect, create, use, store, or share your PHI. This may include information about your plan, claims, health care, medical conditions, prescriptions, payments, and coverage.

We are required by law to:

- Maintain the privacy and security of your PHI.
- Provide you this Notice describing our legal duties and privacy practices.
- Follow the terms of this Notice currently in effect.
- Notify you if a breach of your unsecured PHI occurs.

When required, we limit how we use, share, and ask for your PHI. Federal and state laws, including HIPAA, may give added protection to some health information. This may include mental health, HIV/AIDS, genetic data, and substance use disorder records.

Who this notice applies to

This Notice applies when Priority Health is your health plan or is responsible for following HIPAA rules. It does not apply when Priority Health or one of its related companies provides services for another organization.

This notice also applies to Priority Health and Corewell Health when they work together through an Organized Health Care Arrangement (OHCA). They may share your protected health information (PHI) for treatment, payment, and health care operations related to this arrangement. Priority Health may change who takes part in the OHCA.

These organizations may be separate, but they work together to improve quality and coordinate care. We may also share PHI with companies that provide services for us, such as billing, data review, customer service, technology, or office support. Our contracts require these companies to protect your PHI and follow the law.

How we use and share your information without your authorization

We may use or share your PHI without your written authorization for the following reasons.

Treatment

We may use or share your PHI to support your health care treatment. For example, we may share information about your prescription drugs or care management needs with a provider.

Payment

We may use or share your PHI to pay for your health care services and administer your benefits. This may include using or disclosing PHI to:

- Collect premiums;

- Determine coverage;
- Process and pay medical, pharmacy, dental, or other health-related claims;
- Coordinate benefits with another health plan;
- Obtain or provide information related to prior authorizations;
- Review medical necessity;
- Resolve billing or payment issues; or
- Answer questions about claims or coverage.

Health Care Operations
We may use or share PHI to run and improve the health plan. This may include:

- Quality assessment and improvement;
- Case management and care coordination;
- Disease management programs;
- Utilization review;
- Customer service;
- Enrollment and disenrollment activities;
- Underwriting, rating, or renewal activities;
- Business planning and management;
- Auditing, legal, compliance, and fraud prevention activities;
- Accreditation, licensing, and regulatory activities; and
- Evaluating provider performance or health plan performance.

We will not use or share genetic information for underwriting purposes.

Disclosures to group health plan sponsors
This section applies to fully funded group health plans. We may share limited information to the plan sponsor of your group health plan, usually your employer or another organization that sponsors the plan. For example, Priority Health may share whether you are enrolled or disenrolled from the group health plan.

We may also share summary health information to the plan sponsor. Summary health information generally removes most direct identifiers and may be used by the plan sponsor to obtain premium bids, evaluate plan costs, or decide whether to modify, amend, or terminate the group health plan.
We may also share de-identified health information to the plan sponsor. De-identified information is information that no longer can identify an individual, and for which there is no reasonable basis to believe that it can be used to identify an individual. De-identified information is not considered PHI and is no longer covered by HIPAA.

If the plan sponsor has taken the steps required by federal privacy regulations, Priority Health may share PHI to the plan sponsor only for plan administration purposes the plan sponsor performs on behalf of the group health plan. The plan sponsor may not use PHI for employment-related actions or decisions unless permitted by law.

Additional permitted uses and disclosures
We may use or share your health information without your written permission when the law allows. This may include:

- Improving quality, customer service, and your experience;
- Sending surveys or other messages; you may ask us to stop some messages;
- Reporting diseases, abuse, or neglect;
- Taking part in audits and reviews;
- Following court orders and other legal requests;
- Sharing information with a jail or law officer if you are in custody;
- Helping prevent a serious risk to health or safety;
- Supporting workers' compensation programs;

- Helping with organ donation or transplants;
- Supporting military or national security needs;
- Working with coroners, medical examiners, or funeral directors; or
- Telling you about health programs or services related to your coverage.

We may remove details that identify you or combine your information with information from others. We may use this information for research, data review, staff training, and service improvements. Since this information does not identify you, it does not have the same HIPAA protections.

Use of technologies (including artificial intelligence)
We may use technologies, including artificial intelligence (AI), automated tools, data analysis, or similar technologies. These tools may help us:

- Manage and coordinate your care;
- Improve quality and safety;
- Find possible fraud, waste, or misuse;
- Review how health care services are used;
- Schedule services and prepare records;
- Provide customer service; and
- Find possible health risks or care needs.

These tools may review your health information. This helps our teams provide timely and effective service. People still review the results and make decisions when required by law, contract, or Priority Health policy.

We use these tools in ways that follow privacy, security, and other laws. When outside companies provide these tools, our contracts require them to protect your information.

Uses where you have a choice
You may have a choice before we share some of your health information. You can tell us if we may share it with family, close friends, or others who help with your care or its cost.

If you cannot tell us your choice, we may share the information when we believe it is best for you. We may also share it to help prevent a serious risk to someone's health or safety.

How we use and share your information with your permission
We will get your permission for uses such as:

- Using your information for marketing when required by law;
- Selling your health information;
- Using or sharing disclosing psychotherapy notes, except as permitted by law;
- Certain uses involving substance use disorder records when authorization or consent is required; or
- Research uses or disclosures when your authorization is required by law.

You may revoke your authorization at any time in writing. Revocation will not apply to actions already taken.

Special protections
Some health information may have extra protections under federal or state law. This may include:

- Substance use disorder treatment records;
- Psychotherapy notes;
- Mental health information;
- HIV/AIDS and certain communicable disease information;
- Genetic information; and
- Other information protected by law.

We will protect this information as required by law.

Substance use disorder (part 2)
Priority Health may receive and keep records about substance use disorder treatment. These records may come from programs or providers that diagnose, treat, or refer people for care. Some of these records are protected by a federal law called 42 C.F.R. Part 2.

If you give written permission, we may use or share these records for treatment, payment, and health plan work. We will only use or share them as allowed by law.

Federal law limits how these records may be used against you in a legal or government case. They may only be used if you give written permission or a court allows it.

We will not use or share these records for fundraising unless the law allows it and we have your permission when needed. You may ask us to stop sending fundraising messages that use this information.

Personal and social information related to health
We may collect and keep personal and social information related to your health. Personal information may include your race, ethnic background, language, disability status, sexual orientation, or gender identity. Social information may include your housing, transportation, or access to healthy food. We protect this information as explained in this Notice.

We may use this information to:

- Send you health education;
- Create programs that help improve health;
- Help you get the care you need;
- Learn about your language or access needs;

- Provide language or other support services; and
- Improve care and community health.

We do not use this information to decide your benefits, set your plan cost, or approve health coverage. We do not share it with people or groups that are not allowed to receive it, unless the law allows or requires us to do so.

Retention of PHI
We retain PHI and related records after your coverage ends as required or permitted by applicable law and our record retention policies. The health care industry must follow State and Federal laws for data retention. Those laws require Priority Health to retain records for periods of time. Priority Health's retention policy and practices are in alignment with these State and Federal laws. We may continue to maintain, use, or share your PHI for claims administration, appeals, audits, legal compliance, regulatory reporting, or other health plan operations. Privacy and security protections continue to apply to the PHI we maintain after your coverage ends.

Your Rights
You have the following rights regarding your PHI.

Access and Copies
You have the right to inspect and obtain a copy of PHI we maintain about you. This record set would include enrollment, payment, claims, case management, medical management, and other records we use to make decisions about you. This right does not include certain limited categories such as psychotherapy notes.
- Requests must be made in writing using the appropriate form.
- We respond within 30 days, unless an extension is required.

- A reasonable, cost-based fee may be charged for copies.
- In some cases, your request may be denied. If so, you may request a review of the denial.

Amendments
You may ask to amend PHI about you in a record set if you think it is inaccurate. Your request must be made in writing and explain why the information should be amended. Priority Health may deny the request in certain instances. We may deny your request if:

- We did not create the information.
- The information is not part of our records.
- You are not allowed to review the information.
- We find that the information is correct and complete.

Accounting of Disclosures
You may ask to receive a list of certain disclosures made over the past six years (excluding treatment, payment, and operations). There may be a charge if there are multiple requests within 12 months.

Restrictions
You have the right to ask us to limit how we use or share your health information.

- We are not required to agree to all restrictions requested, except in certain instances.
- If we agree to a restriction, we will comply with it except in emergency situations or as required by law.

Confidential Communications
You may request that we contact you in a specific way or at a specific location.

- For example, you may request contact at a work address instead of home, or by a specific contact method.

- We will accommodate reasonable requests as required by law.

Copy of Notice
You may ask for a copy of this notice at any time. Even if you agreed to receive this notice electronically, you may still receive a paper copy. You may obtain a copy of this notice on our website or by contacting Priority Health.

Breach Notification
You have the right to be notified if your health information is affected by a breach.

- Notifications will be provided in accordance with applicable legal requirements

Choose Someone to Act for You
If you have given someone medical power of attorney, if someone is your legal guardian, or if another person has legal authority to act for you, that person may exercise your rights and make choices about your PHI. Priority Health may require documentation verifying their authority.

Changes to this Notice
We may change this notice and how we protect your information. The new notice may apply to information we already have and information we get later. If we make a change, we will post the new notice on our website. You may also ask us for a copy. We will send it to members when required by law.

Complaints and Contact Information
If you have questions or believe your privacy rights have been violated, you may contact:

- **Priority Health - Privacy Office**
  Address: 100 Corewell Dr. MC 6481, Grand Rapids, MI 49503

Phone: 616-486-4113
Email: privacy@priorityhealth.com

- **Priority Health - Customer Care**: 1-800-942-0954
- You can file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-800-368-1019, or visiting https://www.hhs.gov/hipaa/filing-a-complaint/index.html
- You will not be retaliated against for filing a complaint.

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