

Privacy Policy - Seedco Maryland Navigator and Enrollment Counselor Services

The goal of this privacy policy is to provide effective notice to public and to individuals regarding:

- ❖ Activities that impact privacy, including its collection, use, sharing, safeguarding, maintenance, and disposal of PII
- ❖ Authority for collecting PII
- ❖ Choices, if any, individuals may have regarding how the organization uses PII and the consequences of exercising or not exercising those choices
- ❖ Ability to access and Amend or Correct PII

THIS NOTICE DESCRIBES HOW SEEDCO MAY GATHER, USE OR DISCLOSE INFORMATION ABOUT YOU AND HOW YOU CAN GET ACCESS TO THE INFORMATION SEEDCO GATHERS. PLEASE REVIEW THE NOTICE CAREFULLY.

Protecting your privacy is very important to us. We're telling you about our privacy policy, so you know what information we collect, why we collect it, and what we do with it. This privacy notice is Seedco's and pertains to the exchange of personally identifiable information (PII) and general information between consumers and Seedco Navigators and Enrollment Counselors for the purposes of applying for health insurance coverage through Maryland Health Connection. Seedco is a grantee of Maryland Health benefit Exchange and uses www.marylandhealthconnection.gov to facilitate consumer applications. Seedco does not operate marylandhealthconnection.gov and MarylandHBE.com. These sites are maintained and operated by the Maryland Health Benefit Exchange (MHBE). This privacy notice aligns with the Minimum Acceptable Risk Standards for Exchanges (MARS-E) 2.0, 45 CFR 155.260 Privacy and Security of Personally Identifiable Information, and 45 CFR 155.280 Oversight and Monitoring of Privacy and Security.

What information does Seedco collect and why do we collect it?

When meeting with Seedco Navigators or Enrollment Counselors for the purpose of applying for insurance programs through Maryland Health Connection, PII and household information collected will be entered at the consumer's request into the marylandhealthconnection.gov application portal to determine family eligibility for health coverage programs. Information entered into marylandhalthconnection.gov is managed by Maryland Health Benefit Exchange. For information on their privacy policies please visit:

<https://www.marylandhealthconnection.gov/policies-accessibility/>

Seedco also collects the following information for each household member applying for enrollment into health plans or Medicaid offered through Maryland Health Connection. The following data is collected:

- First and Last name of each household member
- Household Address
- Head of Household phone number
- Head of household email address
- Family income
- Number in family
- Service provided during the visit
- Race/Ethnicity
- Primary language spoken
- Sex
- Year of birth
- Maryland Health Connection application number
- Assistance Date
- Health plan type enrolled in during the visit (Qualified Health Plan, Medicaid or MCHIP)

For what purposes do we collect information and how do we intend to use it internally?

This information will be entered into a secure Salesforce.com database. This information will be used for the following purposes:

1. Navigators will use household data to track the history of services provided to each household in order to improve customer service and maintain a continuity to quality services already provided.
2. To aggregate services provided to Maryland consumers in order to demonstrate performance for grantee MHBE. MHBE funds Seedco to perform application and eligibility services to consumers.
3. To aggregate data and quantitate services performed to Maryland consumers. Examples include; number of enrollments facilitated, average age and languages of consumers served, zip code and county locations of individuals served.
4. This data may be analyzed to identify population trends which suggest gaps in service or underserved uninsured population areas.
5. Seedco will utilize household email addresses to send bulk reminder notices via email concerning open enrollment dates. This will occur no more than twice annually.

Will Seedco share collected PII with external entities?

Seedco will only share PII with external entities for the purposes of successfully processing your application for enrollment programs through Maryland Health Connection.

Seedco will share such information with Maryland Health Benefit Exchange, the State of Maryland entity that operates the marylandhealthconnection.gov application portal, for the purposes of correcting any application issues in order to help the consumer receive the services and programs he/she requests. Likewise, Seedco may share PII such as name and year of birth to entities subcontracted to Seedco to provide Navigator services in performance of its grant

agreement with MHBE. When such occasions require information to be shared, Seedco will only share the minimum information required in order to help consumers complete their applications for insurance programs with Maryland Health Connection.

Do consumers have the ability to consent to specific uses or sharing of PII?

As a consumer you have a right to consent or deny consent to all information collected by Seedco to be stored and maintained in its SalesForce database. Denying consent to having PII stored by Seedco will in no way affect a consumer's ability to receive application and enrollment services by a Seedco Navigator. However, denying consent to share PII with a Navigator to enter into the Maryland Health Connection application portal will likely prevent a successful application to be submitted. For information on the privacy policies of Maryland Health Connection please visit: <https://www.marylandhealthconnection.gov/policies-accessibility/>

How do I request specific uses of PII or change my consent to collect, store and use my information?

Consumers have three methods to request specific uses of PII or to remove their consent for Seedco to collect, store and use their information:

1. Consumers can submit a request by completing the web form at: <https://www.seedco.org/about/#contact>. Please write the changes that are requested. A Seedco representative will contact each consumer request to confirm that the actions are received and completed.
2. Consumers can mail a written request to Seedco at:
Seedco
Attn: Director
216 E. Pulaski Hwy, Suite 212
Elkton, MD 21921
3. Consumers can call the Seedco Maryland hotline at (866) 492-6057 to speak with a representative Monday-Friday 9:00 a.m. - 4:00 p.m.

How can I obtain access to PII?

Consumers can gain access to their PII stored by Seedco by making a request through the following methods:

1. Consumers can submit a request to access their PII by completing the web form at: <https://www.seedco.org/about/#contact>. A Seedco representative will contact each consumer request to confirm that the actions are received and completed.
2. Consumers can mail a written request to Seedco at:
Seedco
Attn: Director

216 E. Pulaski Hwy, Suite 212
Elkton, MD 21921

3. Consumers can call the Seedco Maryland hotline at (866) 492-6057 to speak with a representative Monday-Friday 9:00 a.m. - 4:00 p.m.

How will my PII be protected?

Seedco Navigators receive rigorous training annually on proper methods to collect and handle consumer PII. Seedco Navigators will not store any PII on their person, in their offices or in any other physical method. All PII collected will be entered into www.marylandhealthconnection.gov at the consumer's request for the purposes of assisting consumers to complete an application for health coverage through Maryland Health Connection.

Additionally, Seedco will enter specific data as identified earlier in this document, in a Salesforce database. Salesforce.com is an international business tool operated by Salesforce.com, inc., which Seedco has purchased licenses to utilize. For information on the Salesforce privacy policy, go here:

https://www.salesforce.com/eu/company/privacy/full_privacy/#nav_info

How will I know if Seedco revises activities, practices or policies that affect collection and use of any PII they collect?

Any changes in practice or policy that affect PII or changes in activities that impact privacy will be identified in Seedco's privacy Policy posted at Seedco.org within 10 business days or as soon as practicable after the change. The current privacy policy will be located at: (enter location that this document is posted).

May I opt-out of data collection?

Consumers have the option to opt-out of Seedco's data collection partially or in full.

Consumers can opt-out or modify Seedco's internal data collection process and/or remove their personal data from internal databases.

Consumers have three methods to request specific uses of personal information or to remove their consent for Seedco to collect, store and use their information:

1. Consumers can submit a request by sending an email to: info@seedco.org. Please indicate that you wish to opt-out of data collection and include your name and contact information. A Seedco representative will contact each consumer request to confirm that the actions are received and completed.
2. Consumers can mail a completed opt-out form found at <https://www.seedco.org/wp-content/uploads/2020/08/Opt-Out-Form-Seedco-8-18-2020.pdf> to Seedco at:

Seedco
Attn: Director

216 E. Pulaski Hwy, Suite 212
Elkton, MD 21921

Please indicate that you wish to opt-out of data collection and include your name and contact information. A Seedco representative will contact each consumer request to confirm that the actions are received and completed.

3. Consumers can call the Seedco Maryland hotline at (866) 492-6057 to speak with a representative Monday-Friday 9:00 a.m. - 4:00 p.m.

Do I have the ability to communicate with a privacy official at Seedco?

Consumers who would like to communicate directly with a privacy official can contact:

Felipe De Los Santos, ESQ.
Acacia Network
Corporate Compliance Officer/ Office of Legal Affairs
300 East 17th Street
Bronx, NY 10457
(347) 649-3306
FDeLossantos@acacianetwork.org

Is the Seedco Privacy Policy available through the Seedco organizational website?

This privacy policy is available at: <https://www.seedco.org/affordable-health-care-maryland/> and is also available in hard copy at any Seedco Navigator location in Maryland.