

L.I.F.E. NOW Health Solutions, Inc.

Electronic Census Data Collection Disclosure & Privacy Notice

HIPAA & ERISA Compliance Notice

For Employer Census Submission and Employee Payroll Information

Purpose of Data Collection

L.I.F.E. NOW Health Solutions, Inc. ("L.I.F.E. NOW") administers and supports employer-sponsored preventive care benefit programs offered through participating employers. In order to evaluate employer eligibility, prepare enrollment files, administer plan benefits, and perform ongoing plan administration, participating employers may be requested to submit an Electronic Census containing limited employee demographic and payroll information.

The information requested is used solely for the administration of the employer-sponsored Preventive Care Plan and any associated employee benefit programs for which the employer has elected participation.

Information That May Be Collected

Depending upon the employer's selected services, the Electronic Census may include:

- Employee Name
- Employee Identification Number (if applicable)
- Employee Number
- Hire Date
- Employment Status
- Date of Birth
- Work Location
- Payroll Frequency
- Gross Payroll Amount
- Eligible Compensation
- Payroll Deduction Information
- Benefit Eligibility Status
- Department or Division
- Employee Classification
- Employer Identification Information

Only the minimum information reasonably necessary to administer the Plan will be requested.

Purpose of Payroll Information

Payroll information is collected solely for legitimate plan administration purposes, which may include:

- Determining employee eligibility
- Establishing enrollment records
- Calculating applicable employer and employee contributions
- Coordinating payroll deduction administration (when applicable)
- Preparing enrollment files
- Supporting ongoing plan administration
- Performing compliance reporting
- Facilitating employer administrative reporting

Payroll information is **not collected for marketing purposes** and is **never sold or shared for commercial advertising**.

HIPAA Privacy Statement

To the extent that Protected Health Information ("PHI") is created, received, maintained, or transmitted in connection with administration of the Preventive Care Plan, L.I.F.E. NOW Health Solutions, Inc. maintains administrative, physical, and technical safeguards designed to protect the confidentiality, integrity, and availability of such information in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), including applicable Privacy, Security, and Breach Notification Rules.

Access to employee information is limited to authorized workforce members, plan administrators, business associates, and service providers who require such access to perform authorized plan administration functions.

L.I.F.E. NOW requires its vendors and subcontractors with access to protected information to maintain appropriate confidentiality obligations and, where applicable, execute Business Associate Agreements consistent with HIPAA requirements.

ERISA Disclosure

The Preventive Care Plan is intended to be administered in accordance with applicable provisions of the Employee Retirement Income Security Act of 1974 (ERISA), where applicable.

Information collected through the Electronic Census will be used exclusively for legitimate plan administration activities, including:

- Plan eligibility determination
- Benefit administration
- Fiduciary administration
- Recordkeeping
- Compliance reporting
- Claims administration (if applicable)

- Required governmental reporting

Information will not be disclosed except as permitted or required under ERISA, HIPAA, applicable federal law, or with proper authorization.

Confidentiality of Employer Information

Employer census information constitutes confidential business information.

L.I.F.E. NOW maintains commercially reasonable safeguards to protect:

- Payroll information
- Employee census files
- Employer records
- Administrative reports
- Enrollment records
- Benefit participation information

Employer data is not disclosed to unrelated third parties except as necessary for authorized plan administration or as required by law.

Data Security

L.I.F.E. NOW maintains administrative, technical, and physical safeguards designed to protect Electronic Census information, including:

- Secure encrypted electronic transmission where available
 - Role-based access controls
 - Multi-factor authentication for authorized administrators (where implemented)
 - Secure storage of electronic records
 - Access logging and monitoring
 - Workforce confidentiality requirements
 - Periodic security reviews
 - Secure destruction of records in accordance with applicable retention requirements
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Minimum Necessary Standard

Consistent with HIPAA's Minimum Necessary Standard, L.I.F.E. NOW limits the collection, use, and disclosure of information to only that information reasonably necessary to perform authorized administrative functions.

Authorized Use of Information

Employee census information may be used only for purposes including:

- Employer implementation
- Enrollment processing
- Payroll administration
- Eligibility verification
- Preventive Care Plan administration
- Benefit communication
- Regulatory compliance
- Internal audit
- Financial reconciliation
- Employer reporting

Information shall not be used for unrelated purposes without appropriate authorization unless otherwise permitted by applicable law.

Employer Responsibilities

By submitting an Electronic Census, the Employer represents that:

- The Employer is authorized to provide the information submitted.
 - Appropriate employee notices and authorizations have been provided where required by law.
 - Information submitted is accurate to the best of the Employer's knowledge.
 - The Employer will promptly notify L.I.F.E. NOW of material changes affecting employee eligibility or payroll information.
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Employee Privacy Rights

Where applicable under federal law, employees retain applicable privacy rights concerning their protected information, including rights related to:

- Access to certain information
- Requesting corrections where permitted
- Accounting of disclosures, where applicable
- Filing privacy complaints without retaliation

Employees may direct questions regarding plan privacy practices through their Employer's designated Plan Administrator or Human Resources representative.

Data Retention

Electronic Census information will be retained only for the period reasonably necessary to satisfy plan administration, contractual, legal, regulatory, audit, and record-retention requirements, after which records will be securely destroyed or permanently de-identified in accordance with applicable law.

Disclosure to Service Providers

L.I.F.E. NOW may disclose information to third-party administrators, payroll service providers, compliance consultants, healthcare providers, insurers, legal counsel, auditors, technology vendors, and other authorized service providers solely as necessary to administer the Preventive Care Plan and related employer-sponsored benefits.

Each service provider receiving confidential information is expected to maintain appropriate confidentiality and security protections consistent with applicable contractual and legal requirements.

Contact Information

Questions regarding this Privacy Notice or the handling of Electronic Census information should be directed to:

Privacy Officer

L.I.F.E. NOW Health Solutions, Inc.

Email: ____

Phone: ____

Website: ____

Acknowledgment

By submitting an Electronic Census to L.I.F.E. NOW Health Solutions, Inc., the Employer acknowledges that it has read and understands this Disclosure and Privacy Notice and certifies that the information submitted is provided for authorized administration of the Employer-sponsored Preventive Care Plan and related employee benefit programs.

This Disclosure and Privacy Notice may be updated periodically to reflect changes in applicable federal or state law, regulatory guidance, or plan administration practices.