

TOTAL COSMETIC DENTAL SERVICES™

Privacy statement

Introduction

Dominion National provides this Web site, "kp.org/totalcosmeticdentalservices" (the "**Web site**"), to allow Cosmetic Dental Program participants and other users to apply for program participation, communicate with our staff, review fee schedules, and access additional services. In this capacity, Dominion National, is committed to protecting the privacy of the users of this Web site.

This Privacy Statement applies to the Website which is operated by Dominion National. This Privacy Statement describes how information you provide is collected and used. It also describes the choices available to you regarding use of your personal information and how you can access and update this information.

All of your protected health information maintained by Dominion National, including information you provide on the Website, is also subject to the Notices of Privacy Practices issued by Dominion National under the Health Insurance Portability and Accountability Act ("HIPAA"). The Notices of Privacy Practices may contain additional provisions relating to the use and disclosure of your information that go beyond the terms of this Privacy Statement.

Dominion National is committed to protecting the privacy of the users of the Website. We will use and disclose your personal information as stated in this Privacy Statement.

Website Privacy Statement

Use and disclosure of health information includes using the information to provide treatment to the individual, to make payments for such treatment, and to conduct ongoing quality improvement activities. Our use and disclosure of an individual's personal information (including health information) is limited as required by state and federal law. We do not sell or rent personal information about visitors to the Website.

Security

The Website has security measures in place that are intended to help protect against the loss, misuse, unauthorized access or alteration of information under our control. These measures include encryption of data using the Secure Socket Layer (SSL) system, and using a secured messaging service when we send your personal information electronically to the. Despite these measures, the confidentiality of any communication or material transmitted to or from us via the Website by Internet, text message or email cannot be guaranteed. At your discretion, you may

contact us at the mailing address or telephone number listed in the "Questions, complaints, and contacts" section at the end of this Privacy Statement.

Revisions to the Privacy Statement

We may revise this Privacy Statement from time to time as we add new features or modify the way in which we manage information, or as laws change that may affect our services. If we make material changes to our Privacy Statement, we will post notice of this on our Website prior to the changes becoming effective. Any revised Privacy Statement will apply both to information we already have about you at the time of the change, and any personal information created or received after the change takes effect. We include a version number on this Privacy Statement consisting of the date (year, month, and day) it was last revised. We encourage you to periodically reread this Privacy Statement, to see if there have been any changes to our policies that may affect you.

Website visitor data

Dominion National routinely gathers data on website activity, such as how many people visit the site, the web pages they visit, where they come from, how long they stay, etc. The data is collected on an aggregate, anonymous basis, which means that no personally identifiable information is associated with the data. This data helps us improve our content and overall usage. The information is not shared with other organizations for their independent use.

The Website does not honor a browser's signal or header request not to track the user's activity.

Collecting and using personal information

Except as disclosed in this Privacy Statement, we do not collect any personally identifiable information about visitors to the Website. The policies, sources, and uses of information are outlined in Sections 1 through 18 that follow:

1. Information collection and use

We collect the following personal information from you:

- contact information such as name, email address, mailing address, and phone number
- age or date of birth
- unique identifiers such as user name, account number, and password
- preferences information such as preferred first name and the types of emails you'd like to receive from us
- health or medical information
- credit card information

- bank account information
- medical record number or health record number
- if you apply for Kaiser Permanente Total Cosmetic Dental Services TM Program, personal health and demographic information about you and those dependents for whom you wish to receive services

We use this information to:

- communicate your health information, or the health information of someone you are caring for, to health care providers treating you or the other person
- communicate to you the health information of others you are authorized to act on behalf of on the Website
- pay for prescription refills or medical bills
- apply for Kaiser Permanente Total Cosmetic Dental Services TM Program
- send you requested product or service information
- respond to customer service requests
- administer your account
- send you newsletters, text messages or email communications
- respond to your questions and concerns
- improve our website, and marketing efforts
- conduct internal quality improvement or business analysis

2. Web logs

We maintain standard Web logs that record data about all visitors and customers who use the Website and we store this information. These logs may contain the Internet domain from which you access the site (such as aol.com, abc.org, etc.); the IP address which is automatically assigned to your computer when you get on the Internet (a static IP address may be identifiable as being connected to you, while a dynamic address is usually not identifiable); the type of browser and operating system you use; the date and time you visited; the pages you viewed; and the address of the website you linked from, if any. If you sign on to the Website to use secured features, our Web logs will also contain an individual identifier and show the services you have accessed.

All Web logs are stored securely, and may only be accessed by Dominion National employees or designees on a need-to-know basis for a specific purpose. Dominion National uses Web log information to help us design our Website, to identify popular features, to resolve user, hardware, and software problems, and to make the Website more useful to visitors.

3. Internet cookies

We may place Internet "cookies" on the computer hard drives of visitors to the Website. Information we obtain from cookies helps us to tailor our site to be more helpful and efficient for our visitors. The cookie consists of a unique identifier that does not contain information about you or your health history. We use two types of cookies, "session" cookies and "persistent" cookies.

A session cookie is temporary, and expires after you end a session and close your web browser. We use session cookies to help customize your experience on our site, maintain your signed-on status as you navigate through our features, and to track your "click path" through our Web pages.

Persistent cookies remain on your hard drive after you've exited from our website, and we use them for several reasons. For instance, if you've given us permission to email you with information about your Kaiser Permanente benefits, or for other reasons, we may place a persistent cookie on your hard drive that will let us know when you come back to visit our site. We sometimes use this type of persistent cookie with a "Web beacon" (see below). Persistent cookies will not contain any personal information about you such as a Kaiser Permanente Health/Medical Record number.

You may have software on your computer that will allow you to decline or deactivate Internet cookies, but if you do so, some features of the Website may not work properly for you. For instructions on how to remove cookies from your hard drive, go to your browser's website for detailed instructions. In addition, further information regarding cookies may be available on other Websites or from your Internet service provider. Safari, Chrome, Firefox, Internet Explorer and iOS browsers are commonly used browsers.

5. Re-targeting

We partner with a third party ad network to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect non-personally identifiable information about your activities on the Website and to then provide you with KP advertising on other Website. We may also place a persistent third-party cookie (provided by Google) on your hard drive if you sign on to kp.org. This cookie will prevent kp.org Total Cosmetic Dental Services TM Program participants from seeing advertising that is targeted towards people who are not participants of Kaiser Permanente's Total Cosmetic Dental Services TM Program, when searching on Google.

If you wish to not have this information used for the purpose of serving you targeted ads, you may opt out. Please note this does not opt you out of being served advertising. You may continue to receive generic non-targeted ads.

6. Emails

Your health plan arranges for Dominion National to help manage some of the email communications with you. While we do supply these vendors with email addresses or telephone numbers of those we wish them to contact, your email address or telephone number is never

used for any purpose other than to communicate with you on our behalf. When you click on a link in an email, you may temporarily be redirected through one of Dominion National's servers (although this process will be invisible to you) which will register that you've clicked on that link, and have visited our Website. Your health plan never shares any information, other than your email address or telephone number, with our third-party vendors, which may only share this information with its authorized subcontractors.

7. Evaluation and quality improvement

We will periodically ask users to complete surveys asking about their experiences with features of the Website. Our surveys ask visitors for demographic information such as age, gender, and education, but will not request that users provide specific information about any medical condition. We use survey information for evaluation and quality improvement purposes, including helping Dominion National to improve information and services offered through the Website. In addition, users giving feedback may be individually contacted for follow-up due to concerns raised during the course of such evaluation. Demographic information and Web log data may be stored for future evaluation and quality improvement activities.

8. Application for Kaiser Permanente Total Cosmetic Dental Services TM Program

If you apply for Kaiser Permanente's Total Cosmetic Dental Services TM Program through the Website, you will be asked during the application process to disclose certain personal information so that we can evaluate your eligibility, and you will be asked to verify the truthfulness of your answers.

9. Messages and transactions

Comments or questions sent to us using email or secure messaging forms will be shared with Dominion National staff and health care professionals who are most able to address your concerns. We will archive your messages once we have made our best effort to provide you with a complete and satisfactory response.

Data about your transaction may be stored in these systems, and available to people who test and support these systems.

When you use a service on the secure section of the Website some information you provide may be documented onsite.

10. Credit card transactions

If you provide us with your credit card and/or bank account number for payments, we will treat your credit card and bank account numbers in a secure manner.

11. Data integrity and correction

Requests to view and correct personal information from the Website that is stored in our database may be submitted using the contact information in the "Questions, complaints, and contacts" section below.

If your personal information changes, or to update or request deletion of information collected on our Website, please use the contact information in the "Questions, complaints, and contacts" section below. We will respond to all access requests within 30 days.

12. Children

We do not knowingly collect personally identifiable information from children under the age of 13. If Dominion National is made aware of collecting information from a child under 13 we will delete this information.

13. Disclosures

We may disclose personal information to any person performing audit, legal, operational, or other services for us. We will use information which does not identify the individual for these activities whenever reasonably possible. Information disclosed to vendors or contractors for operational purposes may not be re-disclosed to others by such a vendor or contractor, except as permitted by Dominion National and applicable law.

We may also disclose your personal information:

- as required by law, such as to comply with a subpoena, or similar legal process
- as described in our Notices of Privacy Practices for protected health information
- when we believe in good faith that disclosure is necessary to protect our rights, protect you or others from threats of imminent harm, investigate fraud or other activity in violation of the law, or respond to a government request
- to protect the security and reliability of the Website
- if Dominion National is involved in a merger, acquisition, or sale of all or a portion of its assets. You will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information
- to any other third party with your prior consent to do so

14. Opt out

If a user makes a request to receive information (for example, requesting a subscription to one of our online publications) in an ongoing manner through the Website by providing an email address,

the user may request to discontinue future mailings or messages. Similarly, if you receive information about a Dominion National service through email, you may make a request to discontinue receiving similar messages in the future. All such materials sent to you by email will contain information about how to opt out. A user cannot opt out of receiving communication pertaining to billing.

15. Other requests to limit use and disclosure of your personal information

State and federal laws may allow you to request that we limit our uses and disclosures of your personal information for treatment, payment, and health care operations purposes. We will consider all requests and, if we deny your request, we will notify you in writing. Federal law requires us to agree to your request to restrict disclosures to a health plan or insurer relating to specific health care services, if you have paid for those services in full. The law does not, however, require us to restrict any disclosures we think are important for treatment purposes.

16. Data retention

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements

17. Links to third party websites

Our Website include links to other websites whose privacy practices may differ from those of Dominion National. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

18. Effective Date

This notice is effective on December 13, 2016. If You Have Privacy Questions or Complaints If you are concerned that we may have violated your privacy rights, you may register your complaint with us by sending your written complaint to: Privacy Office 251 18th St S, #900, Arlington VA 22202

Questions, complaints, and contacts

If you want more information about our privacy practices, have any questions or concerns, or want to act on any of your individual rights, please contact us at: (888) 681-5100, (703) 212.3503 or email Privacycoordinator@dominionnational.com.

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