

NOTICE OF PRIVACY PRACTICES

This notice describes how medical information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

This Notice is effective as of January 1, 2007.

- WINS is required by law to maintain the privacy of protected health information, and must inform you of our privacy practices and legal duties. You have the right to obtain a paper copy of this Notice upon request.
- WINS is required to abide by the terms of the Notice of Privacy Practices that is most current. WINS reserves the right to change the terms of the Notice at any time. Any changes will be effective for all protected health information that WINS maintains. It is available on the WINS web-site at www.wins-inc.com. You may request a copy of the revised Notice(s) at any time.
- WINS has a designated Privacy Officer to answer your questions about our privacy practices and to ensure that WINS complies with applicable laws and regulations. The Privacy Officer also will take your complaints and can give you information about how to file a complaint. You can contact the Privacy Officer at 715-832-9467 or toll free at 888-822-4982.

Use and Disclosure of Your Protected Health Information That WINS May Make to Carry Out Treatment, Payment, and Health Care Operations.

- WINS may use information in your record to provide treatment for you. WINS may disclose information in your record to help you get health care services from another provider, a hospital, etc. For example, if WINS seeks an opinion about your condition from a specialist, WINS may disclose information to the specialist to obtain that consultation.
- WINS may use or disclose information from your record to obtain payment for the services you receive. For example, WINS may submit your diagnosis with a health insurance claim in order to demonstrate to the insurer that the service should be covered.
- If your employer is paying for us to provide personal medical services to you as a convenience to you (e.g., on-site blood pressure clinics or other screenings), health care information is not disclosed to them in order for us to receive payment. (Refer to “Notice of policy regarding disclosures to your employer” on page 2.)
- WINS may use or disclose information from your record to allow “health care operations.” These operations include activities like reviewing records to see how care can be improved, contacting you with information about treatment alternatives, and coordinating care with other providers. For example, WINS may use information in your record to train our staff about your condition and its treatment.

Your Rights

- You may ask us to restrict the use and disclosure of certain information in your record that otherwise would be allowed for treatment, payment, or health care operations. However, WINS does not have to agree to these restrictions.
- You have a right to receive confidential communications from us. For example, if you want to receive bills and other information at an alternative address, please notify us.
- You have a right to inspect the information in your record, and you may obtain a copy of it. This may be subject to certain limitations and fees. Your request must be in writing.
- If you believe information in your record is inaccurate or incomplete, you may request amendment of the information. You must submit sufficient information to support your request for amendment. Your request must be in writing.
- You have the right to request an accounting of certain disclosures made by us.
- You have the right to complain to us about our privacy practices (including the actions of our staff with respect to the privacy of your health information). You have the right to complain to the Secretary of the Department of Health and Human Services about our privacy practices. You will not face retaliation from us for making complaints.
- Except as described in this Notice, WINS may not make any use or disclosure of information from your record unless you give your written authorization. You may revoke an authorization in writing at any time, but this will not affect any use or disclosure made by us before the revocation. In addition, if the authorization was obtained as a condition of obtaining insurance coverage, the insurer may have the right to contest the policy or a claim under the policy even if you revoke the authorization.

Notice of Policy Regarding Disclosures to Your Employer

- In most instances, WINS is not permitted to disclose any health information about you to your employer.
- However, if WINS is hired by your employer to provide health care to you, or if WINS see you at the request of your employer or its insurance company, there are certain circumstances where WINS may disclose health information to your employer.
- For example, if WINS examines, treats, or advises you because of a work-related illness or injury, WINS may report certain information to your employer regarding that illness or injury. This is to allow your employer to correct potential problems, and to meet legal requirements (for example, reporting to OSHA). Only information relevant to the work-related illness or injury may be disclosed—the rest of your health information stays private.
- Certain information gathered as a condition of your employment, such as urine drug screen results, may also be reported to your employer.
- WINS also may disclose health information to your employer for workplace medical surveillance. For example, WINS may disclose information to help your employer identify patterns of work related injuries or illnesses.
- Apart from these circumstances, your health information is subject to all the protections allowed for by law.

Use Or Disclosure Of Your Protected Health Information That WINS is Required To Make Without Your Permission

In certain circumstances, WINS may be required by law to make a disclosure of your health information. For example, state law requires us to report suspected child abuse or neglect. Also, WINS must disclose information to the Department of Health and Human Services, if requested, to prove that WINS is complying with regulations that safeguard your health information.

Use Or Disclosure Of Your Protected Health Information That WINS is Allowed To Make Without Your Permission

- There are certain situations where WINS is allowed to disclose information from your record without your permission. In these situations, WINS must use our professional judgment before disclosing information about you. Usually, WINS must determine that the disclosure is in your best interest, and may have to meet certain guidelines and limitations.
- WINS may use or disclose information from your record if WINS believes it is necessary to prevent or lessen a serious and imminent threat to the safety of a person or the public. WINS may report suspected cases of abuse, neglect, or domestic violence involving adult or disabled victims.
- WINS may report births and deaths to public health authorities, as well as certain types of diseases, injuries, adverse drug reactions, and product defects. WINS may disclose information from your record to a medical examiner or coroner. WINS may disclose information to funeral directors to allow them to carry out their duties upon your death. WINS may disclose information from your record to facilitate organ, eye, or tissue donation and transplantation.
- WINS may assist in health oversight activities, such as investigations of possible health care fraud.
- WINS may disclose information from your record as authorized by workers' compensation laws.
- WINS may disclose information from your record if ordered to do so by a court, grand jury, or administrative tribunal. Under certain conditions, WINS may disclose information in response to a subpoena or other legal process, even if this is not ordered by a court.
- WINS may disclose information from your record to a law enforcement official if certain criteria are met. For example, if such information would help locate or identify a missing person, WINS is allowed to disclose it.
- If you tell us that you have committed a violent crime that caused serious physical harm to the victim, WINS may disclose that information to law enforcement officials. However, if you reveal that information in a counseling or psychotherapy session, or in the course of treatment for this sort of behavior, WINS may not disclose the information to law enforcement officials.
- Office staff may contact you to provide appointment reminders as a courtesy. However, you are responsible for remembering your appointment.
- WINS may contact you with information about treatment alternatives or other health-related benefits or services that may be of interest to you.