



Privacy Practices for Internet-based Communications

When you use the Internet to communicate with us, we make the following pledge:

We consider any and all Internet communications as private and confidential.

We will never compromise security and privacy while providing Internet services.

We will monitor and audit security controls to ensure that Internet privacy protection is maximized at all times.

We will publish our Internet security and privacy practices as new technologies evolve.

Personal Information HCAP Collects and How It Is Used

HCAP collects information from users of our site. We use personal information to customize your Internet transaction. Generally, we do not share with third parties the personal information you supply when conducting transactions on our web site. And, unless you specifically key in personal information on our Web site, you browse our Web site anonymously, which means personal information, such as your e-mail address, is not collected.

In addition to the personal information, we gather information on the use of our Web site, including domain name, number of hits, pages visited, length of user session, and so forth to evaluate the usefulness of our site.

Protecting Online Interactions

When you use our online services, you may be asked to provide personal information that is necessary for us to process your request. To ensure your transaction remains confidential, the information is sent to us using an encrypted form in a "secure session" established with Secure Socket Layer (SSL).

After you have submitted information online, we recommend that you close your browser before leaving your computer. This practice ensures you are not leaving personally identifiable information on the computer for those who may use it after you. This is especially important if you are using a computer in a public place.

How We Handle E-mail

We do not offer encrypted Internet e-mail. As a result, when our Web site users send e-mail inquiries to HCAP, the return e-mail address may be used to respond to the e-mail inquiry. HCAP does not use the return e-mail address for any other purpose, nor will we share it with any third parties. For private inquiries including those containing Protected Health Information, use the secure communications available to you in customer service.

What We Do With Voluntary Online Customer Surveys

We encourage you to participate in these surveys because they provide us with important information to improve the services we offer. Your personal information and responses remain strictly confidential. Participation in our surveys is voluntary.

All responses to our surveys are aggregated to create summarized results (such as gender, age, or other demographic information). We then use the summarized results to improve the quality of our services to you.

About "Cookies"

To provide better service and a more effective Web site, we make minimal use of temporary "cookies" in the Member Self Service area of our Web site. A "cookie" is a small text file placed on your hard drive by our Web page server. The cookies used by the HCAP Web site are temporary and are deleted automatically when you close your browser session. Our cookies provide a more personalized online experience by ensuring that your information is accurate. These cookies do not collect personally identifiable information, and we do not combine information collected through cookies with other personal information to determine who you are or your e-mail address.

About "Banner Ads"

Any site banner ads link you to areas of interest only within our Web site. We do not show banner ads for external Web sites.

Links From Our Site

We have links from our Web site to a number of different healthcare-related sites. We provide these links as a courtesy to help you find information. We are not responsible for the performance or content of sites linked from www.myhcap.com since they are beyond our control. We recommend you read the privacy statements on these sites you visit to understand their individual privacy practices.

Protecting Our Children

In compliance with the Children's Online Privacy Protection Act of 1998 (COPPA), we do not knowingly solicit data from children under 18 years of age, and we do not

knowingly market to children under 18 years of age. We recognize that protecting children's identities and privacy online is important and that the responsibility to do so rests with both the online industry and with parents.

Where To Direct Questions About Our Online Privacy Practices

If you have any questions about our online privacy practices, you may send an inquiry through our contact page.

Revisions To This Policy

HCAP reserves the right to revise, amend, or modify our online privacy practices at any time and in any manner.