

GreenState Credit Union

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 provided to you by GreenState Credit Union on behalf of the Wellmark Blue Cross and Blue Shield of Iowa.

The Plan's Duty to Safeguard Your Protected Health Information.

Individually identifiable information about your past, present, or future health or condition, the provision of health care to you, or payment for the health care is considered "Protected Health Information" ("PHI"). The Plan is required by law to maintain the privacy of plan participants' PHI, to provide plan participants with notice of its legal duties as well as privacy practices with respect to PHI, and to notify effected plan participants of a breach of unsecured PHI. The Plan is required to extend certain protections to your PHI, and to give you this Notice about its privacy practices that explains how, when and why the Plan may use or disclose your PHI. Except in specified circumstances, the Plan may use or disclose only the minimum necessary PHI to accomplish the purpose of the use or disclosure.

The Plan is required to follow the privacy practices described in this Notice, though it reserves the right to change those practices and the terms of this Notice at any time. If it does so, and the change is material, you will receive a revised version of this Notice either by hand delivery, mail delivery to your last known address, or some other fashion. This Notice, and any material revisions of it, will also be provided to you in writing upon your request (ask your HR Benefits representative, or contact the Plan's Privacy Official, described below), and will be posted on any website maintained by GreenState Credit Union that describes benefits available to employees and dependents.

You may also receive one or more other privacy notices, from insurance companies that provide benefits under the Plan. Those notices will describe how the insurance companies use and disclose PHI, and your rights with respect to the PHI they maintain.

How the Plan May Use and Disclose Your Protected Health Information.

The Plan uses and discloses PHI for a variety of reasons. For its routine uses and disclosures it does not require your authorization, but for other uses and disclosures, your authorization (or the authorization of your personal representative (e.g., a person who is your custodian, guardian, or has your power-of-attorney) may be required. The following offers more description and examples of the Plan's uses and disclosures of your PHI. Uses and disclosures that are not described in this Notice will be made only with your authorization.

- **Uses and Disclosures Relating to Treatment, Payment, or Health Care Operations.**

- **Treatment:** Generally, and as you would expect, the Plan is permitted to disclose your PHI for purposes of your medical treatment. Thus, it may disclose your PHI to doctors, nurses, hospitals, emergency medical technicians, pharmacists and other health care professionals where the disclosure is for your medical treatment. For example, if you are injured in an accident, and it's important for your treatment team to know your blood type, the Plan could disclose that PHI to the team in order to allow it to more effectively provide treatment to you.
- **Payment:** Of course, the Plan's most important function, as far as you are concerned, is that it pays for all or some of the medical care you receive (provided the care is covered by the Plan). In the course of its payment operations, the Plan receives a substantial amount of PHI about you. For example, doctors, hospitals and pharmacies that provide you care send the Plan detailed information about the care they provided, so that they can be paid for their services. The Plan may also share your PHI with other plans, in certain cases. For example, if you are covered by more than one health care plan (e.g., covered by this Plan, and your spouse's plan, or covered by the plans covering your father and mother), we may share your PHI with the other plans to coordinate payment of your claims.
- **Health care operations:** The Plan may use and disclose your PHI in the course of its "health care operations." For example, it may use your PHI in evaluating the quality of services you received, or disclose your PHI to an accountant or attorney for audit purposes. In some cases, the Plan may disclose your PHI to insurance companies for purposes of obtaining insurance coverage.
- **Other Uses and Disclosures of Your PHI Not Requiring Authorization.** The law provides that the Plan may use and disclose your PHI without authorization in the following circumstances:
 - **To the Plan Sponsor:** The Plan may disclose PHI to the employers (such as GreenState Credit Union) who sponsor or maintain the Plan for the benefit of employees and dependents. However, the PHI may only be used for limited purposes, and may not be used for purposes of employment-related actions or decisions or in connection with any other benefit or employee benefit plan of the employers. PHI may be disclosed to: [name of department] or other employee benefits department for purposes of enrollments and dis-enrollments, census, claim resolutions, and other matters related to Plan administration; payroll department for purposes of ensuring appropriate payroll deductions and other payments by covered persons for their coverage; information technology department, as needed for preparation of data compilations and reports related to Plan administration; finance department for purposes of reconciling appropriate payments of premium to and benefits from the Plan, and other matters related to Plan administration; internal legal counsel to assist with resolution of claim, coverage and other disputes related to the Plan's provision of benefits; managers and directors for the purpose of employee relations.
 - **To Business Associates:** The Plan may contract with individuals or entities known as Business Associates to perform various functions on the Plan's behalf or to provide certain types of services. In order to perform these functions or to provide these services, Business Associates will receive, create, maintain, use

and/or disclose your PHI, but only after they agree in writing with us to implement appropriate safeguards regarding your PHI. For example, the Plan may disclose your PHI to a Business Associate to administer claims or to provide support services, such as utilization management, pharmacy benefit management or subrogation, but only after the Business Associate enters into a Business Associate contract with the Plan.

- **Required by law:** The Plan may disclose PHI when a law requires that it report information about suspected abuse, neglect or domestic violence, or relating to suspected criminal activity, or in response to a court order. It must also disclose PHI to authorities who monitor compliance with these privacy requirements.
- **For public health activities:** The Plan may disclose PHI when required to collect information about disease or injury, or to report vital statistics to the public health authority.
- **For health oversight activities:** The Plan may disclose PHI to agencies or departments responsible for monitoring the health care system for such purposes as reporting or investigation of unusual incidents.
- **Relating to decedents:** The Plan may disclose PHI relating to an individual's death to coroners, medical examiners or funeral directors, and to organ procurement organizations relating to organ, eye, or tissue donations or transplants.
- **For research purposes:** In certain circumstances, and under strict supervision of a privacy board, the Plan may disclose PHI to assist medical and psychiatric research.
- **To avert threat to health or safety:** In order to avoid a serious threat to health or safety, the Plan may disclose PHI as necessary to law enforcement or other persons who can reasonably prevent or lessen the threat of harm.
- **For specific government functions:** The Plan may disclose PHI of military personnel and veterans in certain situations, to correctional facilities in certain situations, to government programs relating to eligibility and enrollment, and for national security reasons.
- **Workers' compensation:** The Plan may release your PHI for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illness.
- **Lawsuits and disputes:** If you are involved in a lawsuit or a dispute, the Plan may disclose your PHI in response to a court or administrative order. The Plan may also disclose your PHI in response to a subpoena, discovery request, or other lawful process by someone involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.
- **Substance use disorder records.** If the Plan creates or maintains substance use disorder (SUD) records on your behalf, you are entitled to receive adequate notice

of the uses and disclosures of such records, as well as your rights and the legal duties of the Plan with respect to such records.

- **Uses and Disclosures Requiring Authorization:** For uses and disclosures beyond treatment, payment and operations purposes, and for reasons not included in one of the exceptions described above, the Plan is required to have your written authorization. Moreover, SUD treatment records received from providers subject to 42 CFR part 2, or any testimony relaying the content of such records, shall not be used or disclosed in civil, criminal, administrative, or legislative proceedings against you or your interests unless you have provided your written authorization, or is subject to a binding court order that provided you with notice and an opportunity to be heard and also was made through subpoena or other legal requirement. Your authorizations can be revoked at any time to stop future uses and disclosures, except to the extent that the Plan has already undertaken an action in reliance upon your authorization. The Plan may not use or disclose a plan participant's PHI for fundraising purposes unless the Plan provides said plan participant with a clear, conspicuous opportunity to elect not to receive any further fundraising communications. The method for a plan participant to opt out of fundraising communications may not cause same plan participant to incur an undue burden or more than a nominal cost. Most uses and disclosure of psychotherapy notes (where appropriate), uses and disclosures of PHI for marketing purposes, disclosures that constitute a sale of PHI, and uses and disclosures not described herein require your, the plan participant's, authorization.
- **Uses and Disclosures requiring you to have an Opportunity to Object:** The Plan may share PHI with your family, friend or other person involved in your care, or payment for your care. We may also share PHI with these people to notify them about your location, general condition, or death. However, the Plan may disclose your PHI only if it informs you about the disclosure in advance and you do not object (but if there is an emergency situation and you cannot be given your opportunity to object, disclosure may be made if it is consistent with any prior expressed wishes and disclosure is determined to be in your best interests; you must be informed and given an opportunity to object to further disclosure as soon as you are able to do so).
- **Prohibited Uses and Disclosures:** The Plan shall not use or disclose PHI that is genetic information for underwriting purposes.

Your Rights Regarding Your Protected Health Information.

You have the following rights relating to your protected health information:

- **To request restrictions on uses and disclosures:** You have the right to ask that the Plan limit how it uses or discloses your PHI. The Plan will consider your request, but is not legally bound to agree to the restriction except as set forth below. To the extent that it agrees to any restrictions on its use or disclosure of your PHI, it will put the agreement in writing and abide by it except in emergency situations. The Plan cannot agree to limit uses or disclosures that are required by law. Effective February 17, 2010 (or such other date specified as the effective date under applicable law), the Plan will comply with any restriction request if: (1) except as otherwise required by law, the disclosure is to the health plan for purposes of carrying out payment or health care operations (and is not for purposes of carrying out treatment); and (2) the PHI pertains solely to a health care item or service

for which the health care provider involved has been paid out-of-pocket in full. The Plan may terminate a restriction if it informs you that it is terminating its agreement to a restriction. Termination of a restriction is not effective for PHI that the Plan must agree to your request to receive. Termination of a restriction is only effective with respect to PHI created or received after the Plan has informed you of said termination. The Plan must agree to a plan participant's request to restrict disclosure of PHI to the Plan when:

- The disclosure is for the payment of healthcare operations and is not otherwise required by law.
- The protected information pertains to a healthcare item or service which has been paid in full other than by the Plan.
- **To choose how the Plan contacts you:** You have the right to ask that the Plan send you information at an alternative address or by an alternative means. The Plan must agree to your request as long as it is reasonably easy for it to accommodate the request.
- **To inspect and copy your PHI:** Unless your access is restricted for clear and documented treatment reasons, you have a right to see your PHI in the possession of the Plan or its vendors if you put your request in writing. The Plan, or someone on behalf of the Plan, will respond to your request, normally within 30 days. If your request is denied, you will receive written reasons for the denial and an explanation of any right to have the denial reviewed. If you want copies of your PHI, a charge for copying may be imposed but may be waived, depending on your circumstances. You have a right to choose what portions of your information you want copied and to receive, upon request, prior information on the cost of copying. The Plan must provide an electronic copy of a plan participant's PHI that is:
 - Maintained electronically;
 - Located in one or more designated record sets; and,
 - In the form and format requested.

The information at a minimum must be machine readable. This provision does not require the Plan to purchase new systems to accommodate electronic requests for a specific form that the Plan does not possess, provided the Plan can produce a copy of the information in an electronic form.

- **To request amendment of your PHI:** If you believe that there is a mistake or missing information in a record of your PHI held by the Plan or one of its vendors, you may request, in writing, that the record be corrected or supplemented. The Plan or someone on its behalf will respond, normally within 60 days of receiving your request. The Plan may deny the request if it is determined that the PHI is: (i) correct and complete; (ii) not created by the Plan or its vendor and/or not part of the Plan's or vendor's records; or (iii) not permitted to be disclosed. Any denial will state the reasons for denial and explain your rights to have the request and denial, along with any statement in response that you provide, appended to your PHI. If the request for amendment is approved, the Plan or vendor, as the case may be, will change the PHI and so inform you, and tell others that need to know about the change in the PHI.

- **To find out what disclosures have been made:** You have a right to get a list of when, to whom, for what purpose, and what portion of your PHI has been released by the Plan and its vendors, other than instances of disclosure for which you gave authorization, or instances where the disclosure was made to you or your family. In addition, the disclosure list will not include disclosures for treatment, payment, or health care operations. The list also will not include any disclosures made for national security purposes, to law enforcement officials or correctional facilities, or before the date the federal privacy rules applied to the Plan. You will normally receive a respond to your written request for such a list within 60 days after you make the request in writing. Your request can relate to disclosures going as far back as six years and in what form you would like the list (for example, paper or electronic). There will be no charge for up to one such list each year. There may be a charge for more frequent requests.
- **To be notified of a breach:** You have the right to be notified in the event that the Plan (or one of the Plan’s Business Associates) discovers a breach of unsecured PHI. In the event such a breach occurs, notice will be provided as soon as possible in the manner prescribed under the laws in effect when the breach occurs. A breach is an impermissible use or disclosure of PHI. These are presumed to be breaches unless the Plan or business associate, demonstrates that there is a low probability that PHI has been compromised.
- **Right to a paper copy of this notice:** You have the right to a paper copy of this notice. You may ask us to give you a copy of this notice at any time. Even if you have agreed to receive this notice electronically, you are still entitled to a paper copy of this notice. You may obtain a copy of this notice at www.greenstatecubenefits.org/insurance. To obtain a paper copy of this notice contact HRBenefits@greenstate.org or the Privacy Official named below.

How to Complain about the Plan’s Privacy Practices.

If you think the Plan or one of its vendors may have violated your privacy rights, or if you disagree with a decision made by the Plan or a vendor about access to your PHI, you may file a complaint with the Plan’s Privacy Official named below. All complaints must be submitted in writing. You also may file a written complaint with the U.S. Department of Health and Human Services (see below for address). The law does not permit anyone to take retaliatory action against you if you make such complaints.

Contact Person for Information, or to Submit a Complaint.

If you have questions about this Notice please contact the Plan’s Privacy Official named below.

If you have any complaints about the Plan’s privacy practices or handling of your PHI, please contact the Plan’s Privacy Official, or:

Medical Privacy - Complaint Division Office for Civil Rights
 U. S. Department of Health and Human Services
 200 Independence Avenue, SW
 Room 509F, HHH Building
 Washington, DC 20201

Privacy Official.

The Plan's Privacy Official, the person responsible for ensuring compliance with this Notice, is:

Gretchen Forristall
Total Rewards Manager
2355 Landon Rd. North Liberty, IA 52317
319-248-7334
gretchenforristall@greenstate.org

Effective Date.

The effective date of this Notice is February 16, 2026 and will remain in effect until further notice.