

# Volvo Human Resources

## United States Policies & Procedures

<b>HR Center of Expertise:</b>	<b>Benefits &amp; Well-Being</b>	<b>ORIGINAL ISSUE: 1/1/2006</b>
<b>SUBJECT:</b>	<b>HIPAA Privacy Rules</b>	<b>REVIEWED:</b>
<b>POLICY #:</b>	<b>BW-01</b>	<b>REVISED: 8/1/2013</b>

**PURPOSE** To promote a common understanding and application of the privacy rules of the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

**SCOPE** This policy applies to all business associates and employees of the Company at all locations within the United States, who are eligible to participate in the group health plans sponsored by Volvo Group North America, LLC., Mack Trucks, Inc. or Volvo Construction Equipment North America, Inc. The term "Company" shall refer to all U.S. Divisions/Business Areas.

### **POLICY**

The group health plans (Plan) will protect the privacy of participant and family member health information (known as Protected Health Information or PHI) in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA). PHI generally will be used only for health plan payment activities and operations, and in other limited circumstances such as where required for law enforcement and public health activities. In addition, the minimum necessary information will be used except in limited situations specified by law. Other uses and disclosures of PHI will not occur unless the participant authorizes them. Participants will have the opportunity to inspect, copy, and amend their PHI as required by HIPAA. Participants can exercise the rights granted to them under HIPAA free from any intimidating or retaliatory acts.

When PHI is obtained by, utilized by, or shared with Business Associates (e.g. claims administrators) providing services to the Plan, they will be required to agree in writing to maintain procedures that protect the PHI from improper uses and disclosures in conformance with HIPAA.

When Volvo receives PHI to assist in Plan administration, it will adhere to its own stringent procedures to protect the information. Among the procedures in place are:

- Administrative and technical firewalls that limit which groups of employees are entitled to access PHI and the purposes for which they can use it;
- Rules for safeguarding PHI from improper disclosures;
- Processes to limit the disclosure of PHI to the minimum necessary;
- A verification process to identify and confirm the authority of persons requesting PHI;
- A training process for relevant staff;
- Processes for filing privacy complaints, and

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- Processes for notification to individuals if a breach of PHI occurs

Volvo may update this policy and its procedures at any time based on Plan guidelines. Volvo will also update this policy and its procedures to reflect any change required by law. Any changes to this policy and procedures will be effective for all PHI that Volvo may maintain. This includes PHI that was previously created or received, not just PHI created or received after the policy and procedures are changed.

### **NOTES:**

- 1) This policy does not confer any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of your employment.
- 2) Although the term "Company" is used collectively for purposes of this policy, as defined in the scope, the employee's employment relationship remains exclusively with their Division/Business Area.
- 3) The provisions of this policy may be revised without prior notice. Revised policies will be posted as quickly as is practicable.
- 4) Any statement, whether written or oral, that conflicts with anything contained in this policy is not the policy of the Company and is not binding upon the Company.