

Notice of Privacy Practices

**Horan Associates, Inc.
&
Horan Securities, Inc.**

THIS NOTICE DESCRIBES HOW PERSONAL HEALTH INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.

PLEASE READ CAREFULLY.

Questions: If you have any questions about this notice, please contact:

For Employee Issues: Mary Ann Weber Privacy Officer — Employees Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707	For Group Client Issues: Aaron Hutchison Privacy Officer — Clients Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707
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We understand that health information about you is personal. We are committed to protecting the personal health information that we maintain as part of the group health care coverage that we sponsor. We have set up policies and procedures to make sure that this health coverage information that identifies you is kept private.

This notice applies to all personal health information that Horan maintains. It will tell you about the ways that we may use and share personal health information about you. It describes our responsibilities for personal health information that we use. Also, this notice tells you about your rights in relation to your personal health information.

**Horan Associates, Inc.’s
and
Horan Securities, Inc.’s
Obligations
Regarding Personal Health Information**

Horan Associates, Inc. and Horan Securities, Inc. [hereafter “Horan”] are required by law to make sure that we protect and safeguard your personal health information that we maintain.

- We must give you this notice that describes our legal duties and our privacy practices concerning your personal health information.
- We must take reasonable efforts to release only the minimum personal health information necessary to accomplish the use, disclosure or request.
- By law, we must follow the terms of our privacy notice that is currently in effect.

Use and Disclosure of Personal Health Information by Horan Associates, Inc. and Horan Securities, Inc.

This notice describes the personal health information practices of Horan in its role of employer sponsor of group health coverage for you. It also describes the responsibilities and obligations that Horan has placed on a third party or insurance carrier that provides or assists in the administration of the health care coverage that you have through Horan.

To provide you with group health care coverage, it is necessary for Horan to plan to collect, store, use and share with others, personal health information about those who have our health care coverage.

Categories of Personal Health Information that We Use

Ordinary Business Practice It is not our ordinary business practice to maintain personal health information about individuals who have health care coverage that Horan sponsors. By formal arrangement we have delegated that responsibility to Humana for health care coverage and Dental Care Plus for dental coverage. Horan will not retain any personal health information from group health coverage in its files or on its premises, except for the following.

- A list of those receiving employer sponsored health care coverage under Horan;
- Documentation of each employee's enrollment in or declination of coverage under Horan for himself / herself and eligible spouse and dependents;
- Copies of Certificates of Creditable Coverage;
- Any de-identified information from which personally identifiable information has been stripped;
- Any information obtained as a result of a request from the employee for assistance from Horan with eligibility, coverage or claims issues.

Although we do not normally maintain or retain group health coverage personal information, sometimes we do temporarily use such information. The following categories give details about the times when we could have access to your personal health information. Not every use or disclosure in a category will be listed, but all of the uses and disclosures permitted by law fall within the categories.

To Obtain and Manage Health Care Coverage The collection, use and sharing of personal health information is necessary to get health care coverage for our employees and eligible dependents. For instance, we may use personal health information to: get premium quotes from insurance carriers or third party administrators or obtain premium underwriting; submit claims for stop-loss or excess loss coverage; obtain legal, accounting, and audit services; manage costs; conduct business management and administrative activities related to the health care coverage.

To Help With Treatment Horan itself does not directly provide any health care treatment. However, we may use or share your personal health care information to help health care providers serve or treat you. For example, we may share information about allergies to a hospital emergency department if needed to render appropriate emergency care.

To Obtain Payment of Claims Horan may use and share your personal health information to make payment possible for covered health care that you receive. This includes determining eligibility for coverage benefits and coordinating coverage with other health care plans. For instance, Horan may tell a health care provider about your medical history to help decide if particular treatment is covered under our group health plan. Also, we may share personal health information with another carrier or third party payor to determine payment responsibility. Horan may also disclose health information related to a worker's compensation program or a work related illness or injury.

To Comply with Laws and Government Authorities Horan will disclose your personal health information when required by federal, state or local law, regulation, or court or government agency order. For example, as permitted or required by law, we must reveal personal health information when: required to work with public officials to prevent or manage a serious threat to public health or safety; required for government monitoring of health care, civil rights laws, or other government oversight activities; ordered to do so by a court or other lawful process relating to a civil lawsuit or criminal matter; and directed by law enforcement officials, coroners, medical examiners, or national security officials in the lawful pursuit of their duties. If ordered by a court or other legal process to provide personal health information about you, Horan will make an effort to tell you about the request.

Your Rights Regarding Your Personal Health Information

You, or a personal representative that you designate, have the following rights regarding any of your personal health information that we may maintain.

Right to Authorize Other Uses and Disclosures Other uses or disclosures of you personal health information not covered by this notice will be made only with your written and signed permission or authorization.

If you give written permission or authorization to disclose your personal health information, you may revoke the authorization or remove the permission at any time. To revoke the authorization or remove the permission, you must tell us in writing. If we have released information before receiving your request to revoke the authorization or remove permission, we will not be able to take that information back.

Right to Request Restriction on Certain Uses/Disclosures. You have the right to ask for a limitation or restriction on the personal health care information that we use and maintain for treatment, payment or health care operations. You also have the right request a restriction or limitation on the information that we disclose to someone involved in your care or payment for your care. For example, you could ask that we not disclose a surgery that you had to a family member or a friend. The law says that we are not required to agree to your request.

To ask for a restriction or limitation, you send a written request to:

For Employee Issues: Mary Ann Weber Privacy Officer — Employees Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707	For Group Client Issues: Aaron Hutchison Privacy Officer — Clients Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707
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In your written request, you must tell us:

- What information you want us to limit;
- Do you want us to limit our use, disclosure or both use and disclosure;
- To whom you want the limits to apply, for example, your spouse.

Right to Receive Confidential Communications You have the right to ask us that we communicate with you about personal health care matters in a certain way. For instance, we can ask that we only contact you about personal health care matters at work, or only by mail.

To ask for confidential communications, you must send a written request to:

For Employee Issues: Mary Ann Weber Privacy Officer — Employees Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707	For Group Client Issues: Aaron Hutchison Privacy Officer — Clients Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707
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Do not tell us the reason for your request. You must tell us in the request how or where you wish to receive a communication that has personal health information. We will comply with any reasonable request.

Right to Inspect and Copy Personal Health Information You have the right to inspect and copy any of your personal health information that Horan maintains in relation to our group health coverage that is used for making health care decisions or claims payment. If you request a copy of this personal health information, we can charge a fee for the costs of copying, mailing or other supplies associated with your request.

We may deny your request to inspect and copy in certain very limited circumstances, as permitted by law. If we deny access to your personal health information, you may request that the denial be reviewed.

To ask for an inspection or copy of your personal health information, you must send a written request to:

For Employee Issues: Mary Ann Weber Privacy Officer — Employees Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707	For Group Client Issues: Aaron Hutchison Privacy Officer — Clients Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707
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Right to Amend Personal Health Information You have the right to ask Horan to amend or change your personal health information that we have if you believe that the information is incomplete or inaccurate.

To ask for a change in your personal health information that we have, you must send a written request to:

For Employee Issues: Mary Ann Weber Privacy Officer — Employees Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707	For Group Client Issues: Aaron Hutchison Privacy Officer — Clients Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707
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We may deny your request for any of the following reasons:

- It is not in writing;
- It does not contain a reason to support why you think that the information is incomplete or inaccurate;
- The information is not kept by Horan;
- The information was not created by Horan, unless the person or entity that created the information is no longer available to make the change;
- The information is not part of the personal health information that you have a right to inspect or copy;
- The information is accurate and complete.

Right to Receive Accounting of Disclosures

You have the right to receive a list or accounting of any non-incident disclosures of the personal health information we have about you that are not authorized by you, not permitted by law or regulation, or related to treatment, payment or group health plan operations. When we become aware of any disclosure not authorized by you or not permitted by law or regulation, we will inform you in writing.

Right to a Paper Copy of this Notice You have the right to another paper copy of this notice. You may ask Horan for it at any time. To get a paper copy of this notice, contact:

For Employee Issues: Mary Ann Weber Privacy Officer — Employees Horan Associates, Inc. 8044 Montgomery Road Suite 520 Cincinnati, Ohio 45236 513-745-0707	For Group Client Issues: Aaron Hutchison Privacy Officer — Clients Horan Associates, Inc. 8044 Montgomery Road Suite 520 Cincinnati, Ohio 45236 513-745-0707
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Changes to This Notice

Horan reserves the right to change this notice and to make new notice provisions effective for all personal health information that it maintains or collects in the future. If we change this notice, we will send you a copy of the changed notice.

Complaints

If you believe that your privacy rights have been violated in relation to personal health information that Horan maintains or uses, you may file a complaint with Horan or with the Secretary of the Department of Health and Human Services. All complaints must be submitted in writing.

You will not be penalized for filing a complaint.

To file a complaint with Horan contact:

For Employee Issues: Mary Ann Weber Privacy Officer — Employees Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707	For Group Client Issues: Aaron Hutchison Privacy Officer — Clients Horan Associates, Inc. 4990 East Galbraith Road Suite 102 Cincinnati, Ohio 45236 513-745-0707
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Revised May 2005