



**MMM Healthcare, LLC.
Notice of Privacy Practices**

This notice will be effective on October 15, 2016

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.

MMM Healthcare, LLC. (MMM) is committed to protect the privacy of your medical records and personal health information. We are required by law to maintain the privacy of your personal health information and provide you with a notice of our legal duties and privacy practices with respect to your personal health information. In case that a breach of unsecured protected health information occurs, you have the right to be notified. This notice describes how we use and disclose your personal health information. It also describes your rights and our legal obligations with respect to your personal health information. A copy of this Notice will be posted in our web sites at www.mmm-pr.com. www.pmcpr.org www.firstpluspr.com.

What is “personal health information”?

- It's the data you gave us when you enrolled in MMM, PMC or First+Plus as well as your medical records and other medical and health information.
- The laws that protect your privacy give you rights related to getting information and controlling how your health information is used. We give you a written notice which is known as a Notice of Privacy Practices which contains information about:
 - how we protect the privacy of your health information
 - how we use or disclose your health Information
 - how you can see the information in your records

How do we protect the privacy of your health information?

Your health information is in a medical record that is the property of MMM

- We make sure that unauthorized people don't see or change your records.
- MMM has a security protocol in all areas and equipments where you could find members' health information.
- Generally speaking, we need that you or your legal representative gives us authorization in writing before we disclose your health information to anyone who is not providing or paying for your healthcare.
- The law allows certain exceptions that do not require us to get your written permission first.
 - For example, we are required to share your health information with government agencies that are monitoring the quality of your care.



MMM use health information about you for treatment, to obtain payment for treatment, for administrative purposes, and to evaluate the quality of care that you receive. Your health information is contained in a medical record that is the physical property of MMM.

How MMM May Use or Disclose Your Health Information?

Your health information can be used or disclosed for one or more of the following purposes without requiring your authorization:

To provide you with medical treatment or other services, ensuring that all healthcare providers serving your treatment have access to specific and first-hand information that is found in your record, so that your care is properly coordinated.

To obtain payment, treatment and services that you receive. For example, a bill may be sent to you or a third-party payer, such as an insurance company or health plan. The information on the bill may contain information that identifies you, your diagnosis, treatment, drugs, among other data.

For Healthcare Operations: For example, your health information may be disclosed to members of the medical staff, risk or quality improvement personnel, and others to:

- evaluate the performance of our staff
- assess the quality of care and outcomes in your case and similar cases
- learn how to improve our facilities and services
- determine how to continually improve the quality and effectiveness of the healthcare we provide

To provide appointment reminders or information about treatment alternatives or other health-related benefits and services that may be of interest to the individual.

Required by law: MMM may use and disclose information about you as required by law. For example:

- for judicial and administrative proceedings pursuant to legal authority
- to report information related to victims of abuse, neglect or domestic violence
- to assist law enforcement officials in their law enforcement duties

Public Health: We may use or disclose your health information for public health activities such as assisting public health authorities or other legal authorities to prevent or control disease, injury, or disability, or for other health oversight activities.

MMM may also use or disclose your health information for purposes of:

Specialized Government Functions such as protection of public officials or reporting to various branches of the armed services.



To comply with laws and regulations related to **Workers' Compensation**.

Health and Safety: to avert a serious threat to the health or safety of you or any other person pursuant to applicable law.

Decedents: MMM may use or disclose health information to funeral directors or coroners to enable them to carry out their lawful duties.

Organ Donation: we may disclose health information for the purpose of organ donation as necessary to carry out the donation.

Research: MMM may disclose protected health information for research purposes.

School Immunization Proof: MMM may disclose proof of immunization to a school if the school is required by law to have such proof of immunization prior to admission and MMM documents the agreement to the disclosure from you or the parent, guardian or person acting as a custodial of a minor.

Other Uses

Psychotherapy Notes: we can only share information regarding psychotherapy notes with your written authorization except if the use is for treatment, payment or healthcare operations; by the originator notes for your treatment; when disclosed as part of a training program in which students, trainees or practitioners learn under supervision to improve their counseling skills and; as part of a defense against a legal action. It can also be disclosed when required by law.

Genetic Information: MMM cannot use or disclose genetic information for underwriting purposes. However MMM could use genetic information, for example, to determine medical appropriateness if you seek a benefit under the plan or coverage.

Fundraising: Only with your permission we may disclose your health information for fundraising activities. You can request us to opt out to receive such notifications.

Marketing: we may contact you without your authorization to 1) give you information about products or services relating to your treatment or our healthcare operations; 2) provide you with nominal gifts; 3) face to face communication; 4) to inform you about government programs that may be of your interest and 5) send you refill reminders or other communications about a drug or biologic that is currently prescribed to you. If we receive financial remuneration for doing a marketing communication to you, we need your prior authorization.



Sale of Protected Health Information: MMM cannot sell your protected health information unless we receive a written authorization from you. Research purposes are an example of sale of protected health information.

Other uses and disclosures will be made only with your written authorization and you may revoke the authorization except to the extent MMM has taken action in reliance on such uses and disclosures.

You have the right to:

- Inspect your medical records held at the plan.
- Know how we have shared your information with others.
- Get a copy of your records, usually within (30) days of your request. We are allowed to charge you a fee for making copies.
- Ask us to make additions or corrections to your medical records. If you ask us to do this, we will consider your request and decide whether the changes should be made.
- Know how your health information has been shared with others for any purposes that are not routine.
- Request restriction of your health information, although MMM is not required to agree to such restriction.
- Receive confidential communication of protected health information by a specific way or at specific location. For example, you may ask that we send information to a particular e-mail account or to your work address. We will comply with reasonable request submitted in writing with specifications of how to receive these communications.
- Receive a copy in paper, if requested, of the Notice of Privacy Practices, even if you previously agreed to receive it electronically.

If we implement a change in a privacy practice described in this notice prior to issuing a revised notice, we reserve the right to change the terms of this notice and make the new notice provisions effective for all the protected health information that we maintain. MMM will post any changes of the notice on the website of the company and will provide the notice to you in the next annual mailing.

Complaints

You have the right to file a complaint with MMM and with the Department of Health and Human Services' Office for Civil Rights by calling 1-800-368-1019 (TTY 1-800-537-7697) or your local Office for Civil Rights. We will not penalize nor retaliate against you for filing a complaint with us or before the Department of Health and Human Services.



If you believe that your privacy rights have been violated, calling Member Services is the first step. If you do not wish to call (or you called and were not satisfied), you can put your complaint in writing and send it to us at:

**Compliance Department
Privacy Officer
Phone: 787-622-3000
PO Box 71114
San Juan, PR 00936-8014**

If you have questions or concerns about the privacy of your protected health information or wish to file a complaint please call us at:

For members of MMM: 787-620-2397, (Metro Area), 1-866-333-5470 (toll free), 1-866-333-5469 TTY, Monday through Sunday, from 8:00 a.m. to 8:00 p.m.

For member of PMC: 787-625-2126 (Metro Area) 1-866-516-7700 (Toll free) 1-866-516-7701 (TTY) Monday through Sunday, from 8:00 a.m. to 8:00 p.m.

For member of First+Plus: 1-888-767-7717 (Toll free) 1-877-672-4242 (TTY) Monday through Sunday, from 8:00 a.m. to 8:00 p.m.