

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.

General Information

The IPM Health and Welfare Trust of Southern California (the "Plan") is committed to maintaining the confidentiality of your private medical information. This section describes our efforts to safeguard your health information from improper or unnecessary use or disclosure and your privacy rights. This section only applies to health-related information created or received by or on behalf of the Plan. We are providing this information to you because privacy regulations issued under federal law, the Health Insurance Portability and Accountability Act of 1996, 45 CFR Parts 160 and 164 ("HIPAA"), require us to provide you with a summary of the Plan's privacy practices and related legal duties, and your rights in connection with the use and disclosure of your Plan information. We must follow the privacy practices that are described while it is in effect.

In this Notice, the terms "Plan," "we," "us," and "our" refer to the Plan and third parties to the extent they perform administrative services for the Plan. When third party service providers perform administrative functions for the Plan, we require them to appropriately safeguard the privacy of your information.

Please note:

If you are enrolled in the Prepaid Plan (HMO), you will also receive a separate notice from your HMO provider that describes the HMO provider's specific use and disclosure of your health information. Your rights with respect to their use and disclosure of your health information are set forth in that separate notice.

Contact Information

If you have any questions regarding privacy practices, please contact:

Privacy Officer
IPM Health and Welfare Trust of Southern California
1168 E. La Cadena Drive
Riverside, CA 92507
951-684-1791
claims@ipmtrust.com

Your Rights

You have the right to:

- Get a copy of your health and claims records
- Correct your health and claims records
- Request confidential communication
- Ask us to limit the information we share
- Get a list of those with whom we've shared your information
- Get a copy of this privacy notice
- Choose someone to act for you
- File a complaint if you believe your privacy rights have been violated

Your Choices

You have some choices in the way that we use and share information as we:

- Answer coverage questions from your family and friends
- Provide disaster relief
- Market our services and sell your information

Our Uses and Disclosures

We may use and share your information as we:

- Help manage the health care treatment you receive
- Run our organization
- Pay for your health services
- Administer the Plan
- Help with public health and safety issues
- Do research
- Comply with the law
- Respond to organ and tissue donation requests and work with a medical examiner or funeral director
- Address workers' compensation, law enforcement, and other government requests
- Respond to lawsuits and legal actions

Your Rights

When it comes to your health information, you have certain rights. This section explains your rights and some of our responsibilities to help you. Federal law provides you with certain rights regarding your protected health information ("PHI"). Parents of minor children and other individuals with legal authority to make health decisions for a Plan participant may exercise these rights on behalf of the participant, consistent with state law.

Get a copy of health and claims records

- You can ask to see or get a copy of your health and claims records and other health information we have about you. Ask us how to do this.
- We will provide a copy or a summary of your health and claims records, usually within 30 days of your request. We may charge a reasonable, cost-based fee.
- However, this right does not extend to (1) psychotherapy notes, (2) information compiled in reasonable anticipation of, or for use in, a civil, criminal, or administrative action or proceeding, and (3) any information, including PHI, as to which the law does not permit access. We will also deny your request to inspect and obtain a copy of your PHI if a licensed health care professional hired by the Plan has determined that giving you the requested access is reasonably likely to endanger the life or physical safety of you or another individual or to cause substantial harm to you or another individual, or that the record makes references to another person (other than a health care provider), and that the requested access would likely cause substantial harm to the other person.
- If your request to inspect or obtain a copy of your PHI is denied, you may have that decision reviewed. A different licensed health care professional chosen by the Plan will review the request and denial, and we will comply with the health care professional's decision.
- You may make a request to inspect or obtain a copy of your PHI by completing the appropriate form available from the Plan. We may charge you a fee to cover the costs of copying, mailing or other supplies directly associated with your request. You will be notified of any costs before you incur any expenses.

Ask us to correct health and claims records

- You can ask us to correct your health and claims records if you think they are incorrect or incomplete. Ask us how to do this.
- We may say "no" to your request, but we'll tell you why in writing within 60 days.
- You may request amendments of your PHI by completing the appropriate form available from the Plan.

Request confidential communications

- You can ask us to contact you in a specific way (for example, home or office phone) or to send mail to a different address.
- We will consider all reasonable requests, and must say "yes" if you tell us you would be in danger if we do not.
- You may request confidential communication of your PHI by completing an appropriate form available from the Plan.

Ask us to limit what we use or share

- You can ask us not to use or share certain health information for treatment, payment, or our operations.
- We are not required to agree to your request, and we may say “no” if it would affect your care.
- The Plan will not agree to any restriction, which will cause it to violate or be noncompliant with any legal requirement. If we do agree to your requested restriction or limitation, we will honor the restriction, except in the case of an emergency, until you agree to terminate the restriction or until we notify you that we are terminating the restriction with respect to PHI created or received by the Plan in the future.
- You may make a request for restriction on the use and disclosure of your PHI by completing the appropriate request form available from the Plan.

Get a list of those with whom we've shared information

- You can ask for a list (accounting) of the times we've shared your health information for six years prior to the date you ask, who we shared it with, and why.
- We will include all the disclosures except for those about (1) treatment, payment, and health care operations, unless the Plan uses electronic health records, (2) to you, (3) incident to a use or disclosure permitted or required by law, (4) pursuant to an authorization provided by you, (5) for directories or to people involved in your care or other notification purposes as permitted by law, (6) for national security or intelligence purposes, (7) to correctional institutions or law enforcement officials, (8) that are part of a limited data set, and (9) that occurred more than six years, or three years for electronic health records, before your request. We'll provide one accounting a year for free but will charge a reasonable, cost-based fee if you ask for another one within 12 months.
- You may make a request for an accounting by completing the appropriate request form available from the Plan.

Get a copy of this Privacy Notice

You can ask for a paper copy of this Notice at any time, even if you have agreed to receive the Notice electronically. We will provide you with a paper copy promptly.

Choose someone to act for you

- If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health information.
- We will make sure the person has this authority and can act for you before we take any action.

File a complaint if you feel your rights are violated

- You can complain if you feel we have violated your rights by contacting us at:

IPM Health and Welfare Trust of Southern California
1168 E. La Cadena Drive
Riverside, CA 92507
951-684-1791
claims@ipmtrust.com

You can file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting www.hhs.gov/ocr/privacy/hipaa/complaints/.

We will not retaliate against you for filing a complaint.

Your Choices

For certain health information, you can tell us your choices about what we share. If you have a clear preference for how we share your information in the situations described below, talk to us. Tell us what you want us to do, and we will follow your instructions.

In these cases, you have both the right and choice to tell us to:

- Share information with your family, close friends, or others involved in payment for your care
- Share information in a disaster relief situation

If you are not able to tell us your preference, for example, if you are unconscious, we may go ahead and share your information if we believe it is in your best interest. We may also share your information when needed to lessen a serious and imminent threat to health or safety.

In these cases, we never share your information unless you give us written permission:

- Marketing purposes
- Sale of your information
- Use or Disclosure involving psychotherapy notes, unless an exception applies

Our Uses and Disclosures

How do we typically use or share your health information?

To protect the privacy of your PHI, the Plan not only guards the physical security of your PHI, but we also limit the way your PHI is used or disclosed to others. We may use or disclose your PHI in certain permissible ways described below. To the extent required under federal health information privacy law, we use the minimum amount of your PHI necessary to perform these tasks. We typically use or share your health information in the following ways.

Help manage the health care treatment you receive

We can use your health information and share it with professionals who are treating you.

Example: A doctor sends us information about your diagnosis and treatment plan so we can arrange additional services.

Run our organization

We can use and disclose your information to run our organization and contact you when necessary. We may use and disclose your PHI for numerous administrative and quality control functions necessary for the Plan's proper operation.

We are not allowed to use genetic information to decide whether we will give you coverage and the price of that coverage, but this does not apply to long-term care plans.

Example: We use health information about you to develop better services for you.

Pay for your health services

We can use and disclose your health information as we pay for your health services.

Example: We share information about you with your dental plan to coordinate payment for your dental work.

Administer the Plan

We may disclose your health information to the Plan Sponsor or to business associates for Plan administration.

Example: Your company contracts with us to provide a health plan, and we provide your company with certain statistics to explain the premiums we charge.

How else can we use or share your health information?

We are allowed or required to share your information in other ways – usually in ways that contribute to the public good, such as public health and research. We must meet many conditions in the law before we can share your information for these purposes. For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/index.html.

Help with public health and safety issues

We can share health information about you for certain situations such as:

- Preventing disease
- Helping with product recalls
- Reporting adverse reactions to medications
- Reporting suspected abuse, neglect, or domestic violence
- Preventing or reducing a serious threat to anyone's health or safety

Do research

We can use or share your information for health research.

Comply with the law

We will share information about you if state or federal laws require it, including with the Department of Health and Human Services if it wants to see that we're complying with federal privacy law.

Respond to organ and tissue donation requests and work with a medical examiner or funeral director

- We can share health information about you with organ procurement organizations.
- We can share health information with a coroner, medical examiner, or funeral director when an individual dies.

Address workers' compensation, law enforcement, and other government requests

- We can use or share health information about you
- For workers' compensation claims
- For law enforcement purposes or with a law enforcement official
- With health oversight agencies for activities authorized by law
- For special government functions such as military, national security, and presidential protective services

Respond to lawsuits and legal actions

We can share health information about you in response to a court or administrative order, or in response to a subpoena.

Additional Protections

Reproductive Health care Records: The final rule "HIPAA Privacy Rule To Support Reproductive Health Care Privacy" went into effect June 25, 2024. This federal law imposes special requirements on the way we can use or disclose your PHI related to reproductive health care. Certain protections apply to how we can share your medical records related to reproductive health care that was lawfully obtained. This means that the reproductive health care service was obtained in accordance with the laws of the state in which it was provided or it was protected, required, or authorized by Federal law (even if it was unlawful in the state in which it was received). We will not use or disclose your PHI related to reproductive health care that was lawfully obtained, for the following activities:

- To conduct a criminal, civil, or administrative investigation into or impose criminal, civil, or administrative liability on any person for the mere act of seeking, obtaining, providing, or facilitating reproductive health care, where such health care was lawfully obtained.
- To identify any person for the purpose of conducting an investigation or imposing liability.

We will not disclose your reproductive health care records for any prohibited purpose (as described above) when we receive a request to disclose your PHI related to reproductive care, unless we have actual knowledge or receive information that demonstrates the reproductive health care was not lawfully obtained. Additionally, when we receive a request to disclose your PHI related to reproductive care, we require the requesting person or entity submit a signed attestation form that it will not be used or is being disclosed for a prohibited purpose, as described above.

Substance Use Disorder Treatment Records: There are limitations on how we can use or disclose records of your identity, diagnosis, prognosis, or treatment maintained in connection with a program related

to a substance use disorder that was conducted, regulated or assisted by a federally assisted program (“SUD records”). SUD records received from programs subject to 42 CFR Part 2, or testimony relaying the content of such records, shall not be used or disclosed in civil, criminal, administrative, or legislative proceedings against you unless based on your written consent, or a court order after notice and an opportunity to be heard is provided to you. A court order authorizing use or disclosure must be accompanied by a subpoena or other legal requirement compelling disclosure before the requested record is used or disclosed.

Stricter State Law: If an applicable state law provides greater health information privacy protections than the federal law, we will comply with the stricter applicable state law.

Our Responsibilities

- We are required by law to maintain the privacy and security of your protected health information.
- We will let you know promptly if a breach occurs that may have compromised the privacy or security of your unsecure health information.
- We must follow the duties and privacy practices described in this Notice and give you a copy of it.
- We will not use or share your information other than as described here unless you tell us we can in writing. If you tell us we can, you may change your mind at any time. Let us know in writing if you change your mind.
- We reserve the right to change the Plan’s privacy practices as described in this Notice. Any change may affect the use and disclosure of your PHI already received or maintained by the Plan, as well as any of your PHI that the Plan may receive or create in the future. If there is a material change to the terms of this Notice, we will inform you of such change as provided by HIPAA and provide you with information about how to get a copy of the revised Notice. To the extent the Plan maintains a website, the Plan will post a copy of the current Notice on the Plan’s website.

9. The Privacy Officer is the contact person for all issues regarding patient privacy and your privacy rights. You may contact him/her at:

Privacy Officer
IPM Health and Welfare Trust of Southern California
1168 E. La Cadena Drive
Riverside, CA 92507
951-684-1791
claims@ipmtrust.com
]

10. EFFECTIVE DATE: The Plan’s privacy policies and procedures became effective April 14, 2003. These procedures have been updated as of February 16, 2026.

11. SECURITY RULE EFFECTIVE DATE: The following are the Plan’s security rules with regard to the creation, receipt, maintenance, storage and transmission of Protected Health Information (“PHI”) via electronic means (“ePHI”).

12. Use and Disclosure of ePHI. The Trust Fund and its Plans may use and disclose ePHI, including ePHI for treatment, payment and operations, and such other uses and disclosures as are permitted and required under the HIPAA Privacy Rule and Security Rule, and the representatives of the Trust Fund shall have access to such PHI, including ePHI, as is necessary for them to perform their duties for the Trust Fund and its Plans.

13. Trustees’ Use and Disclosure of ePHI. To the extent permitted by law, the Trustees may receive, use and disclose ePHI, if, in the sole discretion of the Trustees, such ePHI is necessary for the Trustees to perform their fiduciary or administrative duties as Trustees. In all cases, the Trustees shall receive, use and disclose the minimum amount of ePHI necessary for the Trustee to perform their functions under the Trust Fund, and shall

safeguard such ePHI as required by the Privacy and Security Rules. Each Trustee who receives ePHI from the Trust Fund shall keep such information in strict confidence and shall not use or further disclose the ePHI received from the Trust Fund other than as permitted or required by law and this Agreement or upon the express written permission of the Participant who is the subject of the ePHI.

14. Procedures. The Trust Fund will implement administrative, physical and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the ePHI that it creates, receives, maintains, or transmits on behalf of the Trust Fund, and will ensure the “adequate separation” within the meaning of 45 C.F.R. §164.504(f)(2)(iii) of the data.

For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/noticepp.html