

NOTICE REGARDING WELLNESS PROGRAM ADMINISTRATION

Baystate Healthy is a voluntary wellness program available to all employees. The program is administered according to federal rules permitting employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others. If you choose to participate, one of the activities that you may voluntarily choose to elect to participate in is a health risk assessment (HRA) or health questionnaire (HQ) that asks a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (e.g., cancer, diabetes, or heart disease). You are not required to complete the HRA/HQ.

The information from your HRA/HQ will be used to provide you with information to help you understand your current health and potential risks, and may also be used to offer you services through the wellness program, such as health coaching, nutrition, fitness or tobacco cessation resources. You also are encouraged to discuss your results and care plan with your primary healthcare provider.

If you are unable to participate in any of the health-related activities that are a part of the Healthy Choices Raffle program, drawing, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting Baystate Healthy at 413-794-4939.

Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and Baystate Health may use aggregate information it collects to design a program based on identified health risks in the workplace, Baystate Health will never disclose any of your personal information either publicly or to the employer, except as necessary to respond to a request from you for a reasonable accommodation needed to participate in the wellness program, or as expressly permitted by law. Medical information that personally identifies you that is provided in connection with the wellness program will not be provided to anyone at Baystate Health, including your supervisors or managers and may never be used to make decisions regarding your employment. In order to help plan and evaluate health and wellness programs offered to employees, Baystate Health may at times, include your de-identified personal health information to a data management company contracted by Baystate Health. Baystate Health will receive a group summary of the information in the data report, but your personal information will not be identified in the group summary.

Your health information will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the wellness program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the wellness program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the wellness program will abide by

the same confidentiality requirements. The only individuals who will receive your personally identifiable health information are WebMD Health Services and WebMD health coaches, in order to provide you with services under the wellness program.

In addition, all medical information obtained through the wellness program will be maintained separate from your personnel records, information stored electronically will be encrypted, and no information you provide as part of the wellness program will be used in making any employment decision. Appropriate precautions will be taken to avoid any data breach, and in the event a data breach occurs involving information you provide in connection with the wellness program, we will notify you immediately.

You may not be discriminated against in employment because of the medical information you provide as part of participating in the wellness program, nor may you be subjected to retaliation if you choose not to participate.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact Baystate Healthy at 413-794-4939.