# Pre-Resources page in original prototype

Main title: Sam, the Chatbot

Sam, the Chatbot—your round-the-clock digital customer service support tool. Its there to help you with all your insurance queries and provide you accurate quick solutions/information. We have partnered with Google Cloud and are continuously working on improving the technology and algorithm it's working on.

Our collaboration calls for sharing information between us for testing and development purpose. By clicking agree to the HIPAA authorization you are indicating you are comfortable with Google Cloud having access to the information you type into the chatbot conversation field. This will help us continuously improve the technology and help Sam provide better guidance to everyone.

See Consent Information

# Resources page

Main title: Sam, the Chatbot

### Share data for better results

HealthCo is partnering with Google to develop interactive chat ("chatbot") functionality. We are asking for your consent to ensure we comply with relevant legal requirements when collecting, using, and disclosing your PHI in connection with the Chatbot.

## Benefits to providing your data

- Continuously improved chatbot
- Get more accurate information
- Better user experience as we look into your issues & concerns & address them
- Get other new programs that we have determined would be necessary to help you out

## Why HealthCo needs this

Our collaborations with Google to develop the "chatbot" functionality would allow us to make it better and better over time to help you with all your insurance queries and provide you accurate quick solutions.

This collaboration requires that we share your information with Google for chatbot and other program development, testing, and refinement purposes.

#### What data will be shared?

The information exchanged during the chatbot session may be transmitted to and stored by Google in its cloud platform. Other information includes internet protocol (IP) addresses. browser type, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and in some cases, the number of clicks. Additionally, your PHI will be made available by virtue of you logging into the member portal.

#### **Risks**

Since information exchanged during the chat may be stored by Google in its cloud platform, it will no longer be secured within HealthCo's data center. HealthCo has made a choice to work with Google for good reasons, but we do not have control over how they use that data. Because Google is not subject to the same information management laws and regulations as HealthCo, any information provided or made available to Google through this pilot program can be used and disclosed by Google at its sole discretion. Additionally, because Google will be storing information in a cloud environment, it is possible that information could be accessed from or sent to locations outside of the United States.

View Chatbot HIPAA Authorization



# HIPAA Auth document

# Main title: Digital HIPAA Authorization

HealthCo is partnering with industry-leading technology companies and other service providers to create a remarkable digital member experience. Our goal is to enhance your health-related journey and make your experience on our digital tools and channels more customized and applicable to your specific needs. This collaborative effort (the "Program") involves HealthCo gathering, utilizing, and sharing appropriate customer information with our business partners to help design, implement, and manage innovative capabilities that enable our members to quickly access up-to- to date plan information and other details through a cloud-hosted digital member website, mobile app, and an integrated conversational chatbot tool.

To offer this personalized experience, HealthCo must collect, use, and disclose personal information across our digital tools and channels. This information can include, among other things, demographics such as your name and date of birth, contact information such as phone number, address, and email address, details about receipt of healthcare services such as dates of service and medical conditions and procedures, details about your insurance benefits such as policy number and claims, and information about your activities on our digital tools and channels such as internet protocol (IP) address, device identifier, and cookie ID (collectively, "Personal Information"). By studying the ways in which you navigate through our digital tools and channels, we can continuously improve and optimize the information and programs that match your needs and interests to deliver the right information at the right time throughout your health care experience.

HealthCo is collaborating with companies including Google on digital improvement projects supporting the Program. Our collaborations allow us to offer capabilities such as real-time chat sessions where users can ask questions on our member portal like "have I met my deductible this year" and similar inquiries. These projects require that HealthCo share your Personal Information with its business partners (like Google) for product and solution development, testing, and refinement purposes.

HealthCo recognizes that its business partners may not be subject to the same range of federal and/or state laws governing the collection, use, and disclosure of Personal Information. Nevertheless, we have taken a number of steps to ensure that your information is handled responsibly, such as by maintaining a rigorous internal privacy and data ethics program, negotiating restrictive contract terms with third party service providers, and seeking to obtain your affirmative authorization, as applicable.

As an entity subject to the Health Insurance Portability and Accountability Act (HIPAA), HealthCo must meet standards set by federal regulations regarding the collection, use, and disclosure of Personal Information relating to your healthcare and payment for your care ("Protected Health Information" or "PHI"). We are asking you to sign the below HIPAA Authorization to ensure we comply with relevant legal requirements when collecting, using, and disclosing your PHI in connection with the Program.

### **HIPAA Authorization**

I understand the nature of the digital member experience and the work HealthCo is conducting. I realize the value of HealthCo partnering with technology and service providers to create pioneering products and solutions, such as a chatbot tool, that will benefit consumers like me. I further understand that HealthCo must collect, use, and disclose my Personal Information and

PHI in order to deliver this Program, and must also share this information with certain parties who are not subject to the same laws as HealthCo.

Accordingly, I authorize HealthCo as follows:

I authorize HealthCo to disclose my PHI, including but not limited to information maintained in my health plan's member portal such as policy number, co-pay, co-insurance, and deductible information, dates of service, and claims information, and any information I freely share through the two-way chatbot interface.

I authorize HealthCo to disclose my PHI to its business partners, including but not limited to Google, for purposes of supporting the Program. This Authorization will remain in effect until I revoke it by notifying HealthCo in writing as specified herein.

I acknowledge that when information is shared with these third parties that they are not subject to certain federal and/or state privacy and security laws and regulations in the same manner, or to the same degree, as HealthCo.

I understand that my information, when disclosed to these third parties, may no longer be protected by federal privacy laws.

I further acknowledge that these third parties may be able to use my information for their own commercial purposes.

I am aware that my PHI might include certain sensitive medical information regarding HIV, behavioral health, or drug and alcohol conditions, if such information is contained in my member portal or if I volunteer such information, and I authorize disclosure of this information for Program-related purposes.

I understand the risks to my information by participating in this Program and I hereby authorize the collection, use, and disclosure of my PHI.

I acknowledge that under certain laws or regulations, HealthCo's disclosure of my information could be deemed a "sale" of information. I authorize HealthCo's disclosure of my information in connection with Program activities even if such disclosure constitutes a "sale" under applicable law.

This Authorization will remain in effect until I revoke it by notifying HealthCo in writing. I understand that I may revoke this Authorization at any time by sending an email to HealthCoITSupport@HealthCo.com indicating my intent to revoke, whereafter my account credentials will be removed from the digital tool. I understand that my revocation will not apply to any information collected, used, or disclosed by HealthCo in reliance upon my prior authorization.

I understand that I am not required to provide my authorization in order to receive healthcare services or insurance benefits. I also acknowledge that I am entitled to a copy of this Authorization upon request.

If I choose to revoke this Authorization, I understand that my interactions and experience with HealthCo may no longer be customized to my unique preferences as when I was participating in the Program.