

## NOTICE REGARDING WELLNESS PROGRAM

Go365 is a voluntary wellness program available to all eligible Go365 members. The program is administered according to federal rules permitting wellness programs that seek to improve health or prevent disease.<sup>1</sup> If you choose to participate in the wellness program you will be asked to complete a voluntary health assessment or "HA" 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 will also be offered the opportunity to complete a biometric screening, which will include a blood test for cholesterol and glucose levels. You are not required to complete the HA or to participate in the blood test or other medical examinations.

However, individuals who choose to participate in the wellness program will receive various incentives (Points) for completing a range of activities promoting health. Although you are not required to complete the HA or participate in the biometric screening, only individuals who do so may be eligible to receive the Points associated with those activities.<sup>2</sup>

Additional Points are<sup>3</sup> awarded for individuals who participate in health-related activities or achieve certain health outcomes. If you are unable to participate in any of the health-related activities or achieve any of the health outcomes required to earn the Points, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by calling the number on the back of your Member ID card.

The information from your HA and the results from your biometric screening 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. You also are encouraged to share your results or concerns with your own doctor.

### Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although Go365 [and your employer, if applicable] may use aggregate information collected to design a program based on identified health risks in the workplace, Go365 will never disclose any of your personal health information either publicly or to the employer, except as expressly permitted by law. Medical information that personally identifies you that is provided in connection with the wellness program may not be provided to your supervisors or managers and may never be used to make decisions regarding your employment.

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 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 similar confidentiality requirements. The only individual(s) who will receive your personally identifiable health information are those who you authorize to receive the information such as a registered nurse, a doctor, or a health coach.

Please refer to the Go365 [Notice of Privacy Practices](#) for additional information on ways Go365 uses and protects your confidential medical information. 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 your Human Resources professional at your place of work.

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<sup>1</sup> For employees whose employers have provided Go365 as part of the employer-sponsored wellness program, these laws include 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.

<sup>2</sup> Points are not rewarded for eligible adult and minor children of Go365 members who complete the HA or biometric screening, and who achieve certain outcomes on the biometric screening.

<sup>3</sup> See footnote 2.