



COMPANY POLICY AND PROCEDURE

EFFECTIVE

06/25/12

NUMBER

SP-T-003

NEXT REVIEW

01/01/13

REVISED

06/25/2012

Title: Email Encryption Policy

Purpose

This Policy shall serve to set forth the guidelines on the use of encryption to secure Proprietary Information (“PI”) related to the Company and/or Protected Health Information (“PHI”), when sending such information *via* email. Further, this Policy shall serve to prohibit Company employees from sending PI or PHI “to” or “from” an email established and/or maintained for personal use and/or an email account not issued, approved and supported by the Company (e.g. Gmail). Violation of this Policy and/or Procedure is grounds for disciplinary action up to, and including, termination.

Technical Assistance

In the event an intended recipient of an encrypted email cannot access the encrypted message exchange, please contact ITServices@Corizonhealth.com for further assistance.

Definitions

- a. **Company** is defined as Corizon Health Inc., Corizon Inc., Corizon Health of New Jersey, LLC, PharmaCorr, LLC and/or any other affiliated entities¹ that are subject to the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
- b. **Proprietary Information (PI)** is defined as confidential and sensitive information maintained and protected by the Company which is not public knowledge. Some examples of this type of information include trade secrets and/or financial information.
- c. **Protected Health Information (PHI)** is defined as individually identifiable health information, including demographic information, related to the past, present, or future physical or mental health or condition, the provision of health care to an individual, or the past, present, or future payment for such healthcare, which is received or created by the Company. PHI may be oral or recorded in any other medium including electronic or paper format. PHI does *not* include individually identifiable health information contained in education records or employment records of Company employees.

¹ The Company’s affiliated entities shall only include corporate entities under the ownership and control (direct or indirect) of Valitäts Health Services, Inc.



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Procedures:

Prohibited Email Activity:

Company employees are prohibited from sending or receiving PI or PHI “to” or “from” an email account established and/or maintained for personal use and/or an email account not issued, approved and supported by the Company (e.g. gmail).

For Senders:

- 1. When to encrypt.** When sending PI or PHI *via* email to a domain address *other than* “Corizonhealth.com.” you must use the encryption feature described in paragraph 3 below. All emails sent between users within the domain Corizonhealth.com are kept within our Company network and are therefore secure.
- 2. What to encrypt.** When an email message contains PI or PHI and is being sent to an email address outside of the Corizonhealth.com domain, it must be secured through encryption. (You may also use this feature when sending any other type of information which you would like to remain secure.)
- 3. How to encrypt.** Adding any one of the following key words: **encryptme**, **[ENCRYPT]**, or **[SEND SECURE]** to the subject line of the email, will send the message through our secure email gateway. The end recipient will receive an email advising that they have been sent a secure message, and giving instructions on how they are to retrieve that secure message.

For Recipients:

The intended recipient gets an email in his/her normal Inbox that contains a link to the secure internet-based storage for the email. First time users need to register. Subsequent logins are simpler, using only the password established at the time the recipient registered.

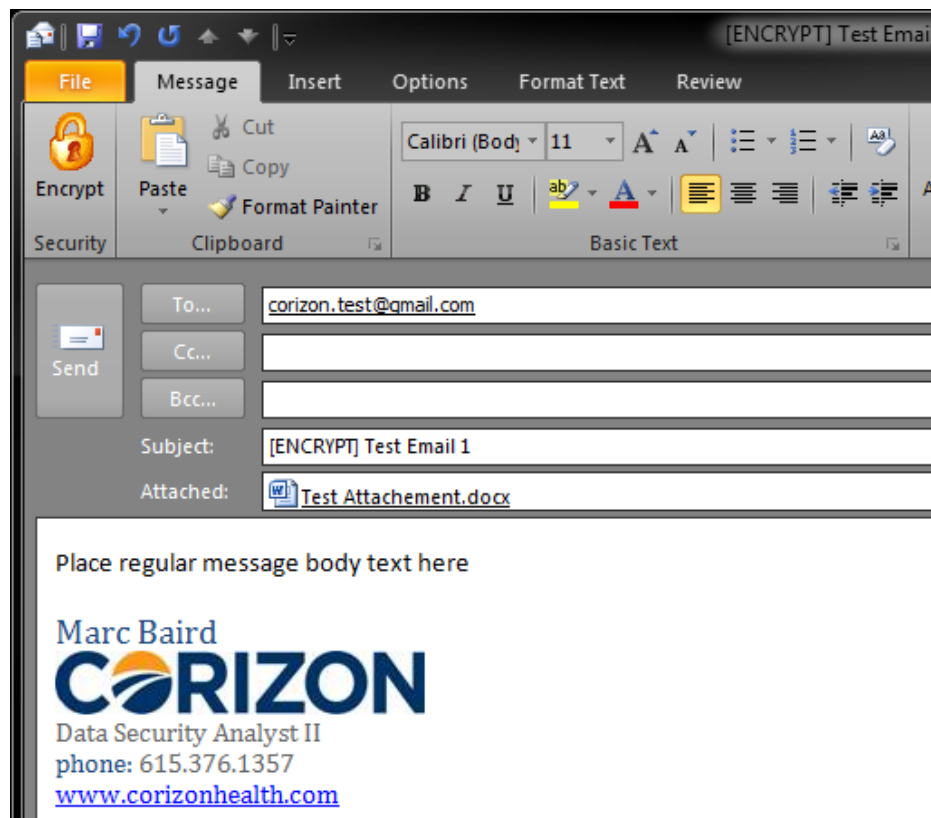
For a more descriptive explanation of the encryption process, please see **Attachment A** to this Policy.

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ATTACHMENT A TO POLICY & PROCEDURE IT NO- _____ “Company Email Encryption Policy”

Process for Senders:

Adding the key words defined in procedural item 3 to the subject line of an email will send the message through our secure email gateway. This encrypts the message and any attachments and delivers it to the recipient.





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Process for Receivers:

The recipient gets an email in his/her normal Inbox that contains a link to the secure internet-based storage for the email. First time users need to register. Subsequent logins are simpler, using only the password set in the following example. (Please note that the mail account used in this document is not monitored and should not be used by any associates, Corizon or otherwise)

Recipient Inbox (first use)

Initial Receipt

The screenshot shows a Gmail-style email interface. At the top left is a red 'COMPOSE' button. Below it is a sidebar with 'Inbox (1)', 'Starred', 'Important', 'Sent Mail', and 'Drafts'. The main area displays an advertisement for 'HIPAA Encryption: Get It - Vormetric.com' with a 'Why this ad?' link. Below the ad is an email notification from 'Baird, Marc' with the subject 'You have a new encrypted message from "Baird, Marc" <Marc.Baird@corizonhealth.com> - "Bai' and a time of '9:24 am'. At the bottom, there is a storage status '0% full Using 0 MB of your 10,261 MB' and a copyright notice '©2012 Google - Terms & Privacy'. On the far right, it says 'Last account activity: 22 minutes ago' with a 'Details' link.

Initial Activation – Step 1

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Subject: Your Encrypted Message Activation Information

Sent: June 25, 2012 2:50:09 PM

Activation Information

To view this message, click the link below and use your activation code to create a free Encrypted Message account. Once you've created your account, you can view your messages you receive from notification@ssm.echoworx.net directly from your Encrypted Message account:

Email: corizon.test@gmail.com

Activation Code: 6qy9p44h

[Click here to create your free account and read your message.](#)

If you do not see an HTML-formatted email above, copy and paste the link below into your browser:

https://securemail5.messagelabs.com/login.html?enterprise=message&locale=en_US&rrMsgUserEmail=corizon.test@gmail.com&rrReqcode=6qy9p44h

For Encrypted Message online help, visit:

https://pr.ssm.echoworx.net/brand?act=download&entp=message&locale=&cat=Resource_Center&f=emx/help/index.html

Initial Activation – Step 2



* Indicates a required field

Enter Your Activation Information

Select language: English (United States)

* First Name:

* Last Name:

* Email Address:

* Activation Code:

Create a Password

* Password:

Password Strength: Strong

* Confirm Password:

End User License Agreement

By using Encrypted Message, you agree to the End User License Agreement.



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Secure Inbox

The screenshot displays an email client interface. On the left is a sidebar with a 'Mailbox' section containing 'Inbox', 'Sent Items', and 'Deleted Items'. Below this are 'Compose' and 'Options' buttons, and a language dropdown set to 'English (United States)'. The main area is titled 'Encrypted Message eXchange' and features a toolbar with 'Verify', 'Print', 'Reply', 'Save', and 'Delete' buttons. The message header includes: 'From: "Baird, Marc" <Marc.Baird@corizonhealth.com>', 'To: "corizon.test@gmail.com" <corizon.test@gmail.com>', 'Cc:', 'Subject: [ENCRYPT] Test Email 1', 'Sent: June 25, 2012 9:24:06 AM', and 'Size: 26KB'. The attachments are 'image001.jpg (3KB)' and 'Test Attachement.docx (0 Bytes)'. The body text is a placeholder: 'Place regular message body text here'. At the bottom, the sender's signature is shown: 'Marc Baird', 'CORIZON', 'Data Security Analyst II', 'phone: 615.376.1357', and 'www.corizonhealth.com'.

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Login after initial registration



\${login.instruction4}

Email Address:

Remember my email address

Password:

Forgot your password?
By using Encrypted Message, you agree to the terms of the **End User License Agreement.**
[Help](#)

Secure Inbox.

Compose Refresh Search Delete First Previous Next Last

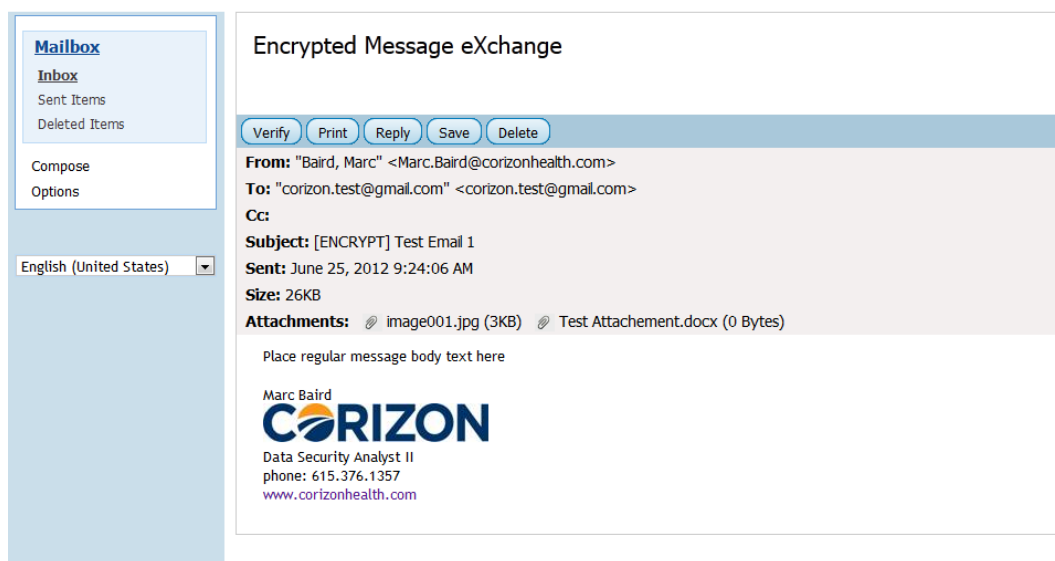
	From:	Subject	Received	Size
<input type="checkbox"/>	Baird, Marc	[ENCRYPT] Test Email 1	June 25, 2012 9:24:06 AM	26KB

1 - 1 of 1 message(s), (1 unread)

English (United States) ▾

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Secured message.



Notes:

- This secure message exchange offers secure two-way communications between the individual client recipient and anyone at Corizon.
- It will not allow them to leverage our secure exchange for anyone beyond Corizon.
- The secure inbox has several features in its system including:
 - Verify – Displays the Corizon senders certificate of authenticity
 - Print – Prints message
 - Reply – Replies to sender
 - Save – Save message to client computer (needed if email is to be forwarded to others)
 - Delete - Deletes message from the secure inbox
- Password resets for the secure inbox are handled via the provider Echoworx. A link is available on the client portal in the event of a password reset.
- **In the event the client cannot access the encrypted message exchange from their computer, please contact ITServices@Corizonhealth.com for further assistance.**