

Guidelines for Electronic Processing of Records and Transactions Relating to Coverage Under Unum Group Insurance Plan(s)

Unum permits electronic processing and communication of records and transactions relating to coverage under its group policyholders' insurance plan(s), provided that the group policyholder can meet certain responsibilities. This document outlines the responsibilities of the group policyholder in submitting electronic information to Unum as well as in maintaining accurate, secure, and authentic records of insurance transactions. If the group policyholder is unwilling or unable to comply with their responsibilities, as outlined in this document, the electronic processing and communication of insurance transactions will not be permitted and an alternate method satisfactory to Unum will be established.

Note: By "Unum" we mean the insuring subsidiaries of Unum Group. In addition, if the group policyholder uses any third party administrative agents, the group policyholder is solely responsible for ensuring that those third parties can and will continue to comply with these guidelines.

For the purposes of these guidelines, records and transactions of coverage pertaining to a group policyholder's insurance plan(s) include, but are not limited to, enrollment elections, beneficiary designations, and changes to plan participant information (including but not limited to family status changes, salary information, division or position changes, etc). Electronic submission of this information must comply with certain file formatting guidelines; these guidelines are outlined in a separate document and initial transmission will be subject to a review by Unum. The group policyholder shall bear the risk for any failure to maintain electronic data or records according to the requirements contained in these guidelines and Unum shall have no liability for actions taken in reliance on inaccurate or incomplete information received from the group policyholder.

Retention of Information and Records

- The group policyholder is responsible for retaining and storing accurate and complete documentation related to plan participant election and eligibility as well as records of coverage under the group policyholder's insurance plan(s) and any changes to that information. Furthermore, records relating to coverage under the group policyholder's insurance plan(s) must be:
 - a) maintained from the time of initial coverage election, enrollment or application for any period required by law;
 - b) protected against destruction, loss or alteration through established and maintained safeguards; and
 - c) promptly provided to Unum at any time upon advance request.

Security and Authentication of Electronic Data

- Any electronic systems used by the group policyholder shall provide PIN code management, user identification and authentication controls; or, the group policyholder will be required to have plan participants complete manually signed documentation related to records of coverage and/or participant information necessary under the insurance plan(s). If information is entered electronically into a system on behalf of the plan participant, the group policyholder must maintain signed and dated authorizations from the plan participant for that transaction record.
- The group policyholder shall employ techniques that track each user's electronic actions and ensure that all electronic information pertaining to transactions which are related to the insurance coverage and/or plan participant information are stored and maintained in such a fashion that will enable Unum to clearly demonstrate the following:
 - a) the identity of the plan participant using the system to authorize the transaction:
 - b) the specific action(s) taken or information provided by the plan participant; and
 - c) that the electronic data is not changed or altered before or during transmission to Unum for processing.



Disclosure of Information

- The group policyholder shall have no authority to effect, alter, modify, waive or change in any way the provisions, terms, or conditions of any group policy or insurance coverage, and any such alteration, modification, waiver or change shall be void. This includes, but is not limited to, inaccurate representations or confirmations of insurance coverage to plan participants at the time of enrollment, claim, or qualifying coverage changes.
- To the extent either Unum or the group policyholder discloses nonpublic personal information to the other, each agrees that it will not disclose or use the information other than to carry out the purposes for which the information was originally disclosed. In addition, both Unum and the group policyholder agree to comply with all federal and/or state laws and regulations applicable to the disclosure of nonpublic personal information.
- All sales literature and advertising materials, including enrollment web sites that reference Unum products or services must be approved in writing by Unum prior to their use.

By submitting electronic data to Unum, you are deemed to have agreed to abide by these guidelines.