

Worldwide TechServices HIPAA Business Associate Privacy Policy

Worldwide TechServices, LLC and its subsidiaries (“WWTS”) take privacy seriously. WWTS shares a commitment with Covered Entities to protect the privacy and confidentiality of Protected Health Information (PHI) that we access during the course of providing services to our end users. These services are subject to the terms of a Business Associate Agreement.

This Policy is provided to help you better understand how to use, disclose, and protect PHI in accordance with the terms of Business Associate Agreements.

Definitions

Business Associate Agreement (BAA). A Business Associate Agreement is a formal written contract between WWTS and a Covered Entity that requires WWTS to comply with specific requirements related to PHI.

Covered Entity. A Covered Entity is a health plan, health care provider, or healthcare clearinghouse that must comply with the HIPAA Privacy Rule. WWTS provides services to some Covered Entities.

Protected Health Information (PHI). PHI includes all “individually identifiable health information” that is transmitted or maintained in any form or medium by a Covered Entity. Individually identifiable health information is any information that can be used to identify an individual and that was created, used, or disclosed in (a) the course of providing a health care service such as diagnosis or treatment, or (b) in relation to the payment for the provision of health care services.

Use and Disclosure of PHI

WWTS does not create, receive, maintain or transmit PHI. However, we may have access to PHI of Covered Entities in the course of its performance of services. In the event a WWTS representative access PHI the procedures required by the Covered Entity should be followed. In no event should PHI leave the Covered Entity’s facility.

If required, WWTS may use PHI for our management, administration, data aggregation and legal obligations to the extent such use of PHI is permitted or required by the BAA and not prohibited by law. We may use or disclose PHI on behalf of, or to provide services to, Covered Entities for purposes of fulfilling our service obligations to Covered Entities, if such use or disclosure of PHI is permitted or required by the BAA and would not violate the Privacy Rule.

In the event that PHI must be disclosed to a subcontractor or agent, WWTS will ensure that the subcontractor or agent agrees to abide by the same restrictions and conditions that apply to us under the BAA with respect to PHI, including the implementation of reasonable and appropriate safeguards.

We may also use PHI to report violations of law to appropriate federal and state authorities.

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Safeguards

WWTS uses appropriate safeguards to prevent the use or disclosure of PHI other than as provided for in the BAA. We have implemented safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the PHI that WWTS may access in the course of performing its services. Such safeguards include:

- Maintaining appropriate clearance procedures and providing supervision to assure that our workforce follows appropriate security procedures;
- Providing appropriate training for our staff to assure that our staff complies with our security policies;

Mitigation of Harm

In the event of a use or disclosure of PHI that is in violation of the requirements of a BAA, we will mitigate, to the extent practicable, any harmful effect resulting from the violation. Such mitigation will include:

- Reporting any use or disclosure of PHI not provided for by the BAA and any security incident of which we become aware to the Covered Entity; and
- Documenting such disclosures of PHI and information related to such disclosures as would be required for Covered Entity to respond to a request for an accounting of disclosure of PHI in accordance with HIPAA.

Access to PHI

As provided in a BAA, we will make available to Covered Entities, information necessary for Covered Entity to give individuals their rights of access, amendment, and accounting in accordance with HIPAA regulations.

Upon request, we will make our internal practices, books, and records including policies and procedures, relating to the use and disclosure of PHI received from, or created or received by WWTS on behalf of a Covered Entity available to the Covered Entity or the Secretary of the U.S. Department of Health and Human Services for the purpose of determining compliance with the terms of the BAA and HIPAA regulations.