HITRUST® ACCOUNTABILITY AGENT POLICIES

As part of HITRUST’s services as an Accountability Agent under the Asia-Pacific Economic Cooperation’s Cross Border Privacy Rules System (CBPRS) and Privacy Recognition for Processors System (PRPS), HITRUST commits to following all the requirements of an Accountability Agent. Many of these are covered in other HITRUST policies, but there are a few policies and procedures that are specific to the CBPRS and PRPS, which are addressed in this document.

As an Accountability Agent, HITRUST commits to cooperating with other Accountability Agents when appropriate. If HITRUST is reviewing a submission from a candidate who has worked with another Accountability Agent, HITRUST may contact that Accountability Agent if there are questions that arise about the validity of the information in the submission. Additionally, HITRUST will respond in a timely manner to any requests for information or other collaboration from other Accountability Agents. The appropriateness of the response will be based on contractual and other legal considerations, including but not limited to confidentiality.

HITRUST also commits to responding in a timely manner to any requests from APEC enforcement agencies. HITRUST will acknowledge the request within two (2) business days of receipt of the request. Within a reasonable time, HITRUST will notify the agency of the status or the request - it is unable to assist, such as when HITRUST does not have the information the agency seeks, if the information is readily available and already collated, or if more time is necessary to respond.

Any allegations of violations shall be investigated by the Chief Compliance Officer and Chief Privacy Officer. If the investigation shows that the claims are valid, HITRUST will either work with the certified entity to remedy the violation or notify the appropriate authorities, in the case of the United States the Federal Trade Commission (FTC), if the situation relates to a possible violation of applicable law.

HITRUST will create an email account – apecaaa@hitrustalliance.net – for all APEC-specific questions and/or comments, which will be monitored by the Chief Privacy Officer, Chief Compliance Officer, and Vice President of Assurance Services.