



## **Confidentiality Policy**

### **Purpose**

The purpose of this policy is to define the extent to which certain information, including but not limited to exam candidate identities, contact information and demographics, payment information, candidate exam performance results, exam content (e.g. items and test forms), business plans and other proprietary information, will be kept private and confidential by IBHRE, its volunteers, staff and contractors, while in use to fulfill the mission and goals of the organization.

### **Scope of Policy**

The provisions of this policy apply to volunteers, staff, independent contractors, agents and representatives of IBHRE, exam candidates and certificants where applicable. While this policy is largely intended to define confidentiality as a means of protecting the identities, personal information and exam results of candidates, which in practice will apply to the actions of IBHRE staff, volunteers, contractors, and agents and representatives of IBHRE, this policy also defines confidentiality as a means of protecting the security of IBHRE exams, exam content, and other intellectual property, thereby applying to the actions of aforementioned staff, volunteers, contractors and agents as well as exam candidates and certificants.

### **Definition of ‘Third Party’**

For the purpose of this policy, the term ‘Third Party’ refers to any individual or group other than IBHRE, its contractors, exam candidates or certificants. Due to the unique relationship between the Heart Rhythm Society (HRS) and IBHRE, HRS is not considered a ‘Third Party’ under this definition. However, HRS, its volunteers, staff, contractors, agents and representatives, are held to the same standard of protecting candidate and certificant privacy and confidentiality as anyone who is directly affiliated with IBHRE.

### **Candidate & Certificant Confidentiality**

Information transmitted to IBHRE, via phone, fax, e-mail, standard mail or Internet, by exam candidates and certificants shall be used by IBHRE, its volunteers, staff and contractors solely for the purpose of administering the certification and recertification programs and shall otherwise be kept in strict confidence. Only authorized IBHRE and HRS personnel may handle and process submitted records containing the personal information of IBHRE exam candidates and certificants. Such records include without being limited to: exam applications, professional development activity forms and IBHRE product order forms.

IBHRE volunteers, staff, and contractors are prohibited from revealing the identity of an exam candidate to any inquiring third party without the expressed written permission of the candidate. IBHRE volunteers, staff and contractors are also prohibited from disclosing any exam score information to third parties without the expressed written permission of the candidate. IBHRE, as an organization, will not distribute or make public any lists, documents or other disclosure of the names, addresses or other personal information of any exam candidate or certificant, nor regarding the candidacy, exam results or

recertification results of candidates or certificants except as necessary to properly administer the examinations and grant certifications in accordance with the other policies of IBHRE.

Exam candidates and certificants have the right make any changes to their contact information as deemed necessary to maintain contact with IBHRE and to ensure safe delivery of exam scores.

#### *Storage of Information*

A permanent record of personal information provided on exam applications and professional development activity forms shall be stored in a secure electronic database only accessible to IBHRE and HRS employees. Exam results that are stored in the database shall only be accessible to authorized personnel only and shall not be accessible to HRS staff at large. Paper applications and other written materials containing personal information concerning examination candidates and certificants shall be maintained in locked file cabinets on the premises of IBHRE headquarters until it is transferred to a secure, off-site storage facility pursuant to the *Record Retention Policy*. Temporary lists and eligibility files containing candidate data will be transferred to entities working for IBHRE on a contractual basis for the sole purpose of fulfilling duties directly related to the administration of an exam. Such contractors shall be required to enter into confidentiality agreements with IBHRE upon terms consistent with this policy.

#### *Limitation of Access*

IBHRE staff and occasionally contractors are the only affiliates with direct access to the personal information and exam results of examination candidates and certificants. These individuals are prohibited from disclosing candidate or certificant information to third parties except where deemed appropriate by this policy.

IBHRE volunteers, including the Board of Directors and Test Writing Committee members, are not permitted direct access to nor entitled to obtain candidate information except where it applies to their formal responsibilities as volunteers. Volunteers who participate in the evaluation of exam results are not informed of the identity of participants in the exam in order to prevent potential for conflict of interest. Volunteers at high levels of decision-making (e.g. IBHRE President, Board of Directors) may encounter situations in which the identity of a candidate or certificant must be disclosed in order to review an issue brought forward by staff, address an appeal or respond to a complaint or grievance. In the event of such cases, volunteers shall keep the identities and interests of all parties involved in strict confidence.

#### *Authorized Disclosure*

Candidates who successfully complete an IBHRE examination are listed on the IBHRE website as IBHRE certificants. By submitting the exam application, a candidate authorizes IBHRE to add their name and exam year to the website provided (and only if) they receive a passing score. IBHRE reserves the right to remove names from the website of individuals who do not successfully renew their certification.

By submitting the exam application, a candidate also authorizes IBHRE to respond to verification requests from third parties regarding the status of their certification. Certification is verified in writing through a standard form that provides confirmation of the candidate's current certification status, date of initial certification, certification ID number and expiration date. All other data and information regarding exam scores and performance are kept fully confidential from third parties unless permission is granted in writing by the candidate or certificant.

### **Confidentiality of Exam Material**

IBHRE volunteers, staff and contractors may not disclose, use, lecture upon or publish in any manner or form any IBHRE test questions, whether or not developed by them. IBHRE volunteers, staff and contractors may not disclose, use, lecture upon or publish in any manner or form any of the practices or

methodologies that are used by IBHRE and its test writing committees in creating such examination questions all of which are the property of and proprietary to IBHRE (collectively the “Proprietary Information”), except as such disclosure, use or publication may be required in connection with their work as a volunteer, employee or contractor for IBHRE, or unless an officer of IBHRE expressly authorizes such in writing.

IBHRE volunteers, staff and contractors must obtain IBHRE's written approval before disclosing, publishing or submitting for publication any test questions or any other material (written, verbal, or otherwise) that relates to their work on behalf of IBHRE or that incorporates any Proprietary Information.

All test questions and examination forms are and shall remain the sole and exclusive property of IBHRE. All examination questions developed individually or in conjunction with others shall be deemed a work made for hire by such individuals or groups of individuals and are the sole and exclusive property of IBHRE. Volunteers, staff and contractors retain no rights in or to such questions or related Proprietary Information.

#### *Candidate & Certificant Confidentiality Requirement*

By submitting (or having submitted) an application to take an IBHRE certification examination, exam candidates and certificants agree that they shall not disclose confidential information (whether oral or written in any form of media) related to, provided by or discussed during the examination or any other information identified as confidential. The aforementioned confidentiality policy is stipulated in the *IBHRE Code of Ethics* against the examination candidate or certificant. Violation thereof may result in sanctions by IBHRE.

#### **Confidentiality of IBHRE Business and Other Interests**

IBHRE expects and requires all volunteers, staff and contractors to keep confidential any sensitive or proprietary business-related information belonging to IBHRE which has not been released to the public domain or generally made known to all stakeholders. Such information includes but shall not be limited to:

- Terms, conditions, fee schedules or other information termed as ‘confidential’ in a contract or other written agreement made between IBHRE and another party
- Delivery of a Request for Proposal pertaining to change in vendor where the current vendor is not included in bidding process
- Unapproved financial records including budgets, statements and balance sheets including any information which may disclose the salary or compensation of IBHRE employees or contractors.
- Pending decisions, deemed confidential, which have not been approved or made public by the IBHRE Board of Directors

#### **Signed Agreement to Comply**

IBHRE volunteers, staff and contractors shall be required to sign a Confidentiality Agreement on an annual basis for so long as they serve in their respective capacity with IBHRE. Agreements will be distributed for signature at the discretion of the Executive Director. All signed agreements will be kept in a permanent record that will be maintained on the premises of IBHRE headquarters.

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