



IBHRE 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 the International Board of Heart Rhythm Examiners (IBHRE), its leaders, 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 leaders, staff, independent contractors, agents and representatives of IBHRE, exam candidates and certified professionals 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, leaders, contractors and agents as well as exam candidates and certified professionals.

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 certified professionals. 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 certified professional privacy and confidentiality as anyone who is directly affiliated with IBHRE.

Candidate & Certified Professional Confidentiality

Information transmitted to IBHRE, via phone, fax, e-mail, standard mail or Internet, by exam candidates and certified professionals 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 certified professionals. Such records include without being limited to: exam applications, maintenance of certification forms and IBHRE product order forms.

IBHRE leaders, 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 leaders, staff, and contractors are also prohibited from disclosing any exam score information to third parties without the express 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 certified professional, nor regarding the candidacy, exam results or recertification results of candidates or certified professionals except as necessary to properly administer the examinations and grant certifications in accordance with the other policies of IBHRE.

Exam candidates and certified professionals 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 certified professionals 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 certified professionals. These individuals are prohibited from disclosing candidate or certified professional information to third parties except where deemed appropriate by this policy.

IBHRE leaders, including the Board of Directors, Test Writing Committee members, Content Experts, and Ambassadors, are not permitted direct access to nor entitled to obtain candidate information except where it applies to their formal responsibilities. Leaders 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. Leaders at high levels of decision-making (*e.g.* IBHRE President, Board of Directors) may encounter situations in which the identity of a candidate or certified professional 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, leaders shall keep the identities and interests of all parties involved in strict confidence in accordance with fiduciary duties and the confidentiality policy.

Authorized Disclosure

Candidates who successfully complete an IBHRE examination are listed on the IBHRE website as IBHRE certified professionals. By submitting the exam application, a candidate authorizes IBHRE to add their name, credential, exam year and business contact information 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.

Verification Rights

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 certified professional.

If IBHRE is required by law to release confidential certification information, the person under inquiry will be notified by IBHRE.

Confidentiality of Exam Material

IBHRE leaders, staff, and contractors may not disclose, use, lecture upon or publish in any manner or form any active/live IBHRE test questions, whether or not developed by them. IBHRE leaders, 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 leader, employee or contractor for IBHRE, or unless an officer of IBHRE expressly authorizes such in writing.

IBHRE leaders, 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. Leaders, staff and contractors retain no rights in or to such questions or related Proprietary Information.

Candidate & Certified Professional Confidentiality Requirement

By submitting (or having submitted) an application to take an IBHRE certification examination, exam candidates and certified professionals 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 certified professional. Violation thereof may result in sanctions by IBHRE.

Confidentiality of IBHRE Business and Other Interests

IBHRE expects and requires all leaders, 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 leaders shall be required to sign a Confidentiality Agreement on an annual basis for so long as they serve in their respective capacity with IBHRE. Staff and contractors shall sign a Confidentiality Agreement upon hire. 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.

Candidate Confidentiality

- Disclosing any and all information obtained during the certification process without written consent is strictly prohibited
- Revealing the identity of an exam candidate to any inquiring third party without the express written permission of the candidate is strictly prohibited
- Disclosing exam score information to third parties without the express written permission of the candidate is strictly prohibited
- Staff and volunteer leaders may not publicize any lists, documents or other disclosure of the names, addresses, candidacy, exam results or recertification results or other personal information of an exam candidate or certified professional, except as necessary to properly administer the examinations and grant certification
- Staff may not provide score related information by phone, fax or e-mail
- Staff may only provide pass/fail results by phone or e-mail upon appropriate confirmation that the inquiring party is the candidate himself (confirmation of home address or Candidate ID number)
- Staff may provide candidates with select scheduling-related information via e-mail as long as that information is submitted to the e-mail address the candidate provided on the original application

- Staff and occasionally contractors are the only affiliates with direct access to personal information and exam results of examination candidates and certified professionals
- Volunteers may not request confidential candidate and certified professional information except where it applies to their role as organizational leaders
- Documents containing private candidate or certified professional information shall be kept in a locked filing cabinet while on the premises of IBHRE headquarters
- Access to IBHRE candidate and certified professional documents is restricted to authorized personnel directly involved in the administration of IBHRE certification exams and maintenance
- Staff may not distribute mass e-mails to IBHRE certified professionals or candidates through their own inbox or through a Microsoft Word Mail-merge. All e-blast communication must be facilitated through the Society's Marketing Department utilizing the Informz e-mail communication system.

If IBHRE is required by law to release confidential certification information, the person under inquiry will be notified by IBHRE.

1.14.2021