

TPA PROGRAM HELPFUL HINTS

Principles of Effective TPA Compliance

IQVIA would like to share ideas that other Vendors have found useful in complying with the restrictions and obligations of the IQVIA *Third Party Access Limited License Agreement*. Vendor's are required to take all reasonable steps necessary to protect IQVIA Data from unauthorized use, access, disclosure, misappropriation, or misuse. Below are some hints to help you do this.

Proportionality

- In determining actions needed to meet TPA requirements, consider factors like the amount of IQVIA Data you have access to, the length of time over which you have access, and the number of employees with access.

Principles of Effective TPA Compliance

- Be aware of your obligations
- Establish standards and procedures to prevent and detect non-compliance
- Assign appropriately positioned employees to be responsible for TPA compliance
- Communicate the practices and procedures of your TPA compliance program to employees
- Take reasonable steps to ensure the TPA requirements are adhered to by your employees
- Periodically evaluate the effectiveness of your TPA compliance program
- Have a system where employees may report non-compliance and seek guidance regarding compliance
- Promote and enforce compliance using appropriate disciplinary measures for non-compliance
- Document compliance
- Periodically assess and take appropriate steps to improve your TPA compliance program

Application of the Principles

- Employ practices *fit for the purpose* of complying with the TPA requirements
- Resource and empower your TPA compliance program to function effectively
- Ensure your TPA compliance practices work

Refer to the Third-Party Access Limited License Agreement

When in doubt, refer to the IQVIA *Third Party Access Limited License Agreement*. It is the document that controls. This *Helpful Hints* is only intended to be a useful guide and does not change any legal obligations Vendor may have under the Agreement.