HIPAA Compliance

SQM Group considers your privacy to be of the highest importance. SQM Group operates as a "Business Associate" as defined under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the implementing regulations at 45 C.F.R. Parts 160 and 164 ("HIPAA Regulations"). When providing quality assurance services, SQM Group may create, receive, maintain, or transmit Protected Health Information ("PHI") on behalf of Covered Entity clients. All such activities are conducted in strict compliance with applicable HIPAA privacy, security, and breach notification requirements.

Use and Disclosure of PHI

SQM Group limits the use and disclosure of PHI to the minimum necessary to perform services as contractually authorized under applicable Business Associate Agreements ("BAAs"). PHI is used solely to perform services on behalf of clients, for permitted operational purposes, including quality assurance analysis, performance monitoring, compliance review, and service improvement. PHI is not used for marketing, data mining, or any secondary purpose prohibited by HIPAA or client agreement. Any PHI disclosed to SQM Group is redacted in accordance with HIPAA de-identification standards, including compliance with the HIPAA Safe Harbor Rules set forth in 45 CFR §164.514(b)(2) where applicable and are not disclosed except as required under HIPAA. As it is not necessary to the services provided, SQM Group makes every effort to not store any PHI in any form. Please see SQM Group's Privacy Policy for more information.

Administrative Safeguards

SQM Group maintains a comprehensive HIPAA compliance program that includes written policies and procedures, workforce training, and documented risk management practices. SQM Group has high standards of professional competence and ethical conduct, and all employees are required to complete a background screening and security check prior to employment with SQM Group. All personnel with potential access to PHI receive initial and annual HIPAA training, including confidentiality obligations. Access to PHI is role-based, formally approved, and periodically reviewed. Workforce members are subject to disciplinary measures for HIPAA violations, up to and including termination.

Physical Safeguards

PHI is protected through controlled physical access to facilities and systems. Data centers, offices, and workstations are secured using industry-standard access controls, visitor management, and monitoring. Workforce access to physical locations where PHI may be present is restricted to authorized individuals only. Media containing PHI is securely stored, transported, and destroyed in accordance with documented retention and disposal policies. Please see the Security section of SQM Group's Privacy Policy for more information.

Technical Safeguards

SQM Group implements technical safeguards consistent with 45 C.F.R. §164.312, including access controls, unique user authentication, audit logging, and transmission security. PHI is encrypted in transit and at rest using commercially reasonable encryption standards. Please see the Security section of SQM Group's [Privacy Policy](#) for more information on its technical safeguards. Any vendor that may create, receive, maintain, or transmit PHI on behalf of SQM Group is required to execute a written agreement imposing HIPAA-compliant obligations. Vendor risk assessments are performed prior to engagement and periodically thereafter to ensure ongoing compliance.

Breach Notification and Incident Response

SQM Group maintains a documented incident response and breach notification process. In the event of a suspected or confirmed Breach of Unsecured PHI, SQM Group will promptly investigate, mitigate harmful effects, and notify the applicable Covered Entity without unreasonable delay, and in no event later than the timeframes required under 45 C.F.R. §164.410. Cooperation with Covered Entities and regulators is a standing obligation.

Ongoing Compliance and Audit Readiness

HIPAA compliance is treated as a continuous operational requirement. Risk assessments are conducted annually, policies are updated to reflect regulatory changes, and compliance controls are tested to ensure effectiveness. SQM Group is prepared to support Covered Entity audits, regulatory inquiries, and diligence requests with appropriate documentation and transparency.