

TPA PROGRAM HELPFUL HINTS

Applying the 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*. Vendors 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.

Effective TPA Compliance Practices

- Leverage existing policies, procedures and controls, e.g., reporting, GDPR, HIPAA, Antibribery, etc.
- Adopt practices that will be most effective for your organization
- Promote a culture that encourages compliance with TPA requirements
- If you have access to significant IQVIA Data for significant time periods, develop a formal / dedicated TPA Compliance program

Employ Practices Fit for the Purpose

- Establish standards and procedures to prevent and detect non-compliance
- Provide periodic training and communication regarding obligations and restrictions
- Maintain documentation of compliance

Resource and Empower your Program to Function Effectively

- Leadership messaging to respect 3rd party intellectual property and compliance with contractual requirements
- Empower employees to do the right thing
- Follow through on your compliance plan and implement it

Ensure your TPA Compliance Practices Work

- Periodically test, review, and continuously improve TPA compliance practices
- Investigate noncompliance and misuse and report violations
- Take corrective and preventive actions in response to noncompliance

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.