



Geisinger

Confidentiality for Vendors

Geisinger Privacy Office

Introduction

- At Geisinger, we take the privacy and confidentiality of our patients, members and employees very seriously
- Even vendors that are not business associates may receive sensitive information or have incidental exposure to protected health information (PHI)
- If you receive, handle, collect or maintain PHI as part of the services you provide, you should also review our HIPAA and Privacy Overview For Our Business Associates available on the Vendor Relations page of our website:

<https://www.geisinger.org/about-geisinger/corporate/vendor-relations>

The following slides are intended for informational purposes, and highlight Geisinger's expectations regarding confidentiality. All vendors are required to be familiar with the terms and conditions related to confidentiality. Such terms could be in a master service agreement, non-disclosure agreement, or other contract.

Sensitive Data

Sensitive data includes: Personally Identifiable Information (PII), protected health information (PHI), business sensitive information, or other non-public information. All vendors that receive sensitive data are expected to have reasonable safeguards in place to prevent the unauthorized use or disclosure of such data.

It is expected that you:

- Will be familiar with all confidentiality provisions in your contract or NDA
- Will identify and appropriately handle sensitive data
- Will timely report any inappropriate uses or disclosures to Geisinger



Incidental Exposure to PHI

Any vendor that has incidental exposure to PHI in the performance of their contractual duties is expected to follow all instructions from supervising Geisinger staff regarding confidentiality, and to keep such information strictly confidential. PHI should not be retained or utilized.

Example: A vendor is required to be on-site to perform its duties. In performing its duties, the vendor's agents may come into contact with patients or information regarding their treatment. Such information should be kept confidential, and any on-site staff should follow any instructions provided by Geisinger staff. Such instructions may include wearing a visitor badge, being escorted while on premises, or signing log in sheets.



Reporting Issues

If a vendor becomes aware that sensitive information is being inappropriately used or disclosed, the issue should be reported to Geisinger as soon as possible.

To report privacy issues, please refer to your contract or contact Geisinger's System Privacy Office at 570-271-7360 or systemprivacyoffice@Geisinger.edu

