

HIPAA Subprocessor Management Guide

Overview

Stannp carefully manages all subprocessors and agents who may create, receive, maintain, or transmit Protected Health Information (PHI) on our behalf. This ensures the same high standards for PHI protection extend throughout our service delivery chain.

Subprocessor Requirements

Before engaging any subprocessor who will have access to PHI, we execute a Business Associate Agreement with written assurances that the subprocessor will appropriately safeguard PHI. The agreement requires the subprocessor to use and disclose PHI only as permitted; implement appropriate safeguards; fulfill breach notification obligations; and obtain similar agreements from any of their own subprocessors who will access PHI.

Due Diligence

Stannp conducts due diligence before engaging subprocessors including:

- reviewing their security and privacy practices;
- verifying they have appropriate policies, procedures, and training programs;
- confirming they maintain cyber insurance and other protections;
- and checking references from other clients who entrust them with sensitive information.

Ongoing Monitoring

We continuously monitor subprocessor compliance through periodic reviews, audits, and assessments. We investigate any reports or credible evidence of violations. We maintain a current list of all subprocessors with PHI access, which is available to covered entities upon request. If we become aware of a material breach by a subprocessor, we take reasonable steps to cure the breach, immediately notify affected covered entities, and terminate the contract if the breach cannot be cured.

Your Rights

As a covered entity customer, you have the right to know which subprocessors Stannp uses to process your PHI. You may request our current subprocessor list at any time. You may also request information about a subprocessor's training and compliance practices. If you have concerns about a specific subprocessor, please contact our compliance team to discuss alternative arrangements.

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