



Q-interactive

Q-interactive™ Data Security & Privacy

Technical Whitepaper

November 2015

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Introduction.

Q-interactive provides clinicians the opportunity to better serve their clients. Using today's technology, clinicians can create client profiles, choose and develop test batteries, and review scored data. Administration involves using two tablets that "talk" to each other via Bluetooth® connection. The clinician uses one tablet to administer the tests, record and score responses, take notes, and control visual stimuli. The client uses the other tablet to view and respond to stimuli. Some questions regarding the accessibility and security of information are likely to arise. Here are some of the most frequently asked questions.

Frequently Asked Questions.

1. *What personally identifiable information is collected via Q-interactive?*

The Personally Identifiable Information (PII or PHI) collected includes only the information you provide when completing the simplified Client Profile Form, test responses, and scores.

2. *Where is client data stored?*

Client data is transferred from the tablet, using a secure connection, and stored in an encrypted database at Pearson's dedicated hosting facility in Toronto, Ontario, Canada. All transfers to or from the web application to the tablet are automatically encrypted, using industry best practices.

3. *How does Pearson protect personal data?*

Pearson security for data stored on Q-interactive complies with the standards established by the HIPAA Security Regulations and in accordance with the HITECH Act applicable to Business Associates. The following types of general safeguards protect your personal data stored on Q-interactive):

- Administrative safeguards,
- Physical safeguards, and
- Technical safeguards.

Such data is secure on Q-interactive as follows:

- When you Access the System. The https Q-interactive site and its database are password protected.
- During your Administration of an Assessment or Battery. Your data is saved in an encrypted directory on the tablet device.
- Through a Secure Transmission. The application syncs the encrypted data from the encrypted tablet directory to the web application periodically over a secure (industry-standard Secure Socket Layer (SSL) Internet connection.
- With your Stored data. At the Pearson dedicated hosting facility, your data is protected utilizing encryption, physical security, and administrative safeguards.

4. *How can I access my client's information?*

Use your password to log onto Q-interactive and retrieve or download your stored data at any time, 24/7.

5. *Why is the data stored in Canada?*

Pearson's dedicated hosting facility in Canada accommodates the security requirements of U.S., Canadian, European Union, and other global data privacy laws.

6. *Can Pearson use my client data for research?*

Personally Identifiable Information (PII) will not be used by Pearson for any purpose except with your express written permission and consent. Pearson may statistically aggregate raw data in de-identified non-personally-identifiable form from non-identifying information collected; and during the testing process for internal quality control, operations management, security, and research to enhance, develop and improve tests and testing processes. De-identification of data means that the extracted demographics and test responses cannot be identified as belonging to any individual and specifically meets the de-identification standard as required by HIPAA in 45 CFR §164.514(b)(1).

7. *Is Pearson HIPAA compliant?*

Pearson and its Q-interactive application comply with applicable security and privacy regulations as set out in both HIPAA and the HITECH Act for a Business Associate.

8. *Is Pearson a Business Associate of health care providers that use its services?*

If you are a Covered Entity as defined by HIPAA, when you agree to Pearson's Business Associate Addendum || <http://www.helloq.com/business-associate-addendum.html>, Pearson becomes your Business Associate under HIPAA.

9. *Are the latest HITECH changes to the HIPAA rules incorporated in Pearson's Business Associate Agreement?*

The Q-interactive Business Associate Addendum addresses all issues that became effective with the HITECH act changes effective March 2013.

10. *What is Pearson's position on releasing data pursuant to HIPAA requests?*

The Business Associate Addendum to the Q-interactive License agreement addresses the release of data to the Covered Entity pursuant to HIPAA.

Pearson's Online Documents for Q-interactive.

The Q-interactive documents (1–4) offer more comprehensive descriptions of the roles and expectations of Pearson and the user, regarding the use of Q-interactive. These documents are accessible on the Q-interactive website, HelloQ.com/Home and at Q-interactive Central (Qinteractive.com).

1. *Q-interactive Business Associate Addendum*

A Business Associate Agreement is only relevant to customers who are identified as a "Covered Entity" under HIPAA. If you are a Covered Entity under HIPAA, Pearson's Business Associate Agreement is provided and describes how Pearson will perform certain functions/activities that involve the use or disclosure of protected health information on behalf of or provides services to the Covered Entity.

The Q-interactive Business Associate Addendum addresses such topics as obligations of the Business Association and the Covered Entity, and the permitted uses and disclosure of protected health information. To read it, click here: <http://www.helloq.com/business-associate-addendum.html>.

2. *Q-interactive Privacy Policy*

The Privacy Policy explains what personally identifiable information is collected, the safeguards in place to ensure data is secure, and how Pearson handles your data. To read it, click here:

<http://www.helloq.com/privacy-policy.html>.

3. *Q-interactive Subscription & License Agreement*

This is the Agreement between you (as an individual or business entity) and Pearson regarding your use of Q-interactive. To read the agreement, click here: <http://www.helloq.com/q-interactive-subscription-license.html>.

4. *Pearson's Terms & Conditions of Sales & Use*

These Terms and Conditions of Sale and Use of Pearson Products describe Pearson's requirements for:

- Test Security
- Use of Product
- Embargoes
- Copyright and Trade Secrets

To read it, click here: <http://www.helloq.com/terms-conditions-sale-use.html>

To learn more about Q-interactive, visit HelloQ.com/home.