

## **Trust & Security FAQ**

### **What is XINOVEE**

XINOVEE is a security-first healthcare infrastructure focused on audit visibility and identity-based access governance. We help organizations understand how access is granted and used across systems in order to improve accountability, audit readiness, and operational oversight.

### **Does XINOVEE store or process patient data?**

No.

XINOVEE does not store, process, or analyze Protected Health Information (PHI), patient identifiers, or clinical content during pilot engagements.

### **Does XINOVEE require access to live clinical systems?**

No.

Pilot engagements are non-production and do not involve live clinical systems. Pilots are designed to evaluate audit visibility and access governance using limited, non-identifiable data.

### **What data does XINOVEE accept during a pilot?**

XINOVEE accepts only:

- De-identified audit logs
- Aggregated access or event metadata
- System-level or role-based identifiers
- Policy and procedural documentation

Any data not explicitly listed above is not accepted.

### **What data does XINOVEE explicitly not accept?**

XINOVEE does not accept:

- Patient identifiers
- Clinical records or notes
- Diagnostic or treatment data
- Full user credentials
- Live production system access

**How is pilot data stored?**

Pilot data is stored in restricted, access-controlled environments. Access is limited to authorized XINOVEE personnel and used solely for the defined pilot purpose.

**How long is pilot data retained?**

Pilot data is retained only for the duration of the pilot engagement and is deleted upon completion unless otherwise agreed in writing.

**Does XINOVEE use AI?**

Yes, in a limited and controlled way.

AI is used only to assist with:

- Summarizing sanitized outputs
- Highlighting patterns or anomalies
- Supporting reporting and documentation

AI is **not** used to process PHI, patient identifiers, or clinical content.

**Does AI replace compliance or security decision-making?**

No.

AI does not replace human judgment, operational controls, or compliance decision-making. All findings are reviewed and interpreted by humans.

**Is XINOVEE HIPAA compliant?**

XINOVEE supports HIPAA Security Rule alignment by strengthening audit visibility and access governance.

XINOVEE does not claim HIPAA certification by default and does not operate as a covered entity during pilot engagements.

**Does XINOVEE sign Business Associate Agreements (BAAs)?**

Not currently and not during pilot engagements.

Pilot engagements are structured to avoid the handling of PHI and therefore do not require a BAA.

**Who is XINOVEE built for?**

XINOVEE is designed to support:

- Security teams

- Compliance and risk teams
- IT and identity governance teams

It is not a clinical system and does not replace EHRs, IAM platforms, or SIEMs.

### **Where is XINOVEE based?**

Washington, D.C.

### **XINOVEE's BAA-Ready Roadmap**

XINOVEE is intentionally designed to mature toward BAA-eligible engagements over time, following a phased approach aligned with healthcare industry expectations.

#### **Phase 1: Non-PHI Pilot Infrastructure (Current)**

- No PHI ingestion or processing
- Limited-scope pilot engagements
- De-identified audit and access metadata only
- Restricted storage and access controls
- Clear data retention and deletion policies

#### **Phase 2: Hardened Security & Operational Controls**

- Formalized security policies and procedures
- Expanded logging and monitoring controls
- Incident response documentation
- Independent security review or assessment

#### **Phase 3: BAA-Eligible Architecture (Future)**

- Optional PHI handling pathways (customer-controlled)
- Dedicated environments for PHI workloads
- Formal Business Associate Agreement availability
- Expanded compliance and audit support

### **Important Clarification**

This roadmap is provided for transparency only. It does not represent a commitment, timeline, or contractual obligation.

BAA execution is evaluated on a case-by-case basis and only after XINOVEE determines that the appropriate technical, operational, and legal controls are in place.

