Progress ShareFile
with HIPAA Support

December 2025

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and The Health Information Technology for Economic and Clinical Health Act (2009) are U.S. federal laws that establish and enforce national standards for Protected Health Information (PHI).

ShareFile is already built with **enterprise-grade security**. When HIPAA support is enabled, ShareFile provides configurations and tools designed specifically to assist customers with their enhanced obligations. These features are not intended to replace your organization's broader HIPAA compliance program, and as such do not alone guarantee HIPAA compliance. It is your responsibility to configure and use ShareFile in a manner that complies with applicable law.

ShareFile with HIPAA support is available with select plans and only under a valid, mutually executed Business Associate Agreement (BAA) with Progress. Under the BAA, Progress is a "Business Associate" or "Subcontractor" of our customer, who is typically a "Covered Entity" or another Business Associate.

ShareFile Supports HIPAA Compliance

Here's a growing list of ways that ShareFile supports your compliance efforts:

✓ **Business Associate Agreement**. We provide a BAA to eligible customers, ensuring that we contractually comply with our HIPAA obligations. We also require that our vendors sign BAAs to ensure that they are obligated to uphold their HIPAA obligations.

✓ **Limited Access**. Our vendors undergo rigorous vetting. Additionally, where appropriate, we use safeguards to limit data sharing such as using on-prem deployments or vendors that support no-view architectures (where data remains encrypted and inaccessible to them).

✓ **In-Product Tooltips and Reminders**. ℹ️ This icon appears in certain areas of ShareFile's platform to signal actions that require your extra attention to best practices. Clicking or hovering over the icon may reveal tips that guide informed decisions when sharing data or adjusting account settings.

✓ **HIPAA-Dedicated Storage**. Primary data is stored in clusters specifically designed to meet HIPAA requirements.

✓ **Secure Email Notifications**. Generally, standard email is not HIPAA compliant. ShareFile helps reduce risk by automatically limiting the inclusion of potentially sensitive data fields (such as file names) in certain email notifications. However, ShareFile cannot control all user actions. You are responsible for ensuring that ShareFile is not used to transmit PHI via email.

✓ **Encrypted Inbox Messaging**. You can securely share information using encrypted email links, enabling recipients to access content directly within the ShareFile platform. This approach keeps data in a protected environment and prevents exposure through traditional, non-compliant email channels.

✓ **Default Configurations**. ShareFile's default configurations are optimized for HIPAA support, reducing the need for manual adjustments. These include built-in **Multi-Factor Authentication (MFA),** our **AI-Powered Secure Share Recommender**, as well as various restrictions on public sharing and third-party integrations, all designed to help minimize the risk of accidental data exposure. However, because admins and users can adjust settings, you must periodically review them and make updates as needed.

✓ **Extended Retention**. We retain event logs for extended periods to facilitate investigations.

✓ **Administrator-Controlled Settings**. Admins have granular control over various user permissions to help support your organizational compliance policies.

✓ **Audits**. We undergo regular assessments by third parties to verify our HIPAA posture.

✓ **Avoid Conflicting Regulations**. Safeguards are built in to help avoid user enablement of features that may conflict with HIPAA.

✓ **Restricted Plan Changes**. Once an account is enabled with HIPAA support, it cannot be switched to a ShareFile plan that does not include HIPAA support. This helps protect PHI and ensures continuity for long-term customers, even when administrators change.

Ineligible Services, Features, and Activities

The following ShareFile services, features, and activities may be available or accessible to you, but they **are not eligible** for HIPAA support nor subject to the Progress BAA:

- ✖ Third party products
- ✖ Integrations, connectors, and file/data exports
- ✖ Public or anonymous share links
- ✖ On-prem products and any external or customer owned or controlled environments outside of the ShareFile web application, such as local device storage (ex: offline sync for Windows).
- ✖ Plugins such as ShareFile for Outlook or ShareFile for Google Workspace
- ✖ Mobile apps
- ✖ Question and Answer
- ✖ Feedback and Approval
- ✖ Document Templates
- ✖ Beta products, tech previews, or similar products provided for customer evaluation
- ✖ All prohibited activities (below)

Prohibited Activities

Customers on ShareFile HIPAA support plans must abide by the following restrictions:

- ✖ Do not publicly share PHI.
- ✖ Do not include PHI in any documents or free-text fields that are sent via email by ShareFile.
- ✖ Do not enable or trigger folder email notifications (download alerts, upload alerts, or "notify added users" when adding people to a folder with a name that includes PHI).
- ✖ Do not attach completed PDFs in email (for completed e-signature requests containing PHI).
- ✖ Do not create hyperlinks to external sites outside of ShareFile's web application.
- ✖ Do not input PHI into any document template or similar feature intended to be deployed in a reusable manner.
- ✖ Do not input PHI into any publicly accessible area or website. PHI may only be entered within the ShareFile web application after user login.
- ✖ Do not enter health-related information into fields intended for other data types (such as name, date, or address).
- ✖ Do not use ShareFile in any other manner that causes Progress to violate HIPAA.

Additional Notice

ShareFile with HIPAA support is provided on a go-forward basis, starting when HIPAA support is enabled on your account and the Progress BAA is mutually executed. Data processed before that point is not retroactively covered under HIPAA support or the Progress BAA.