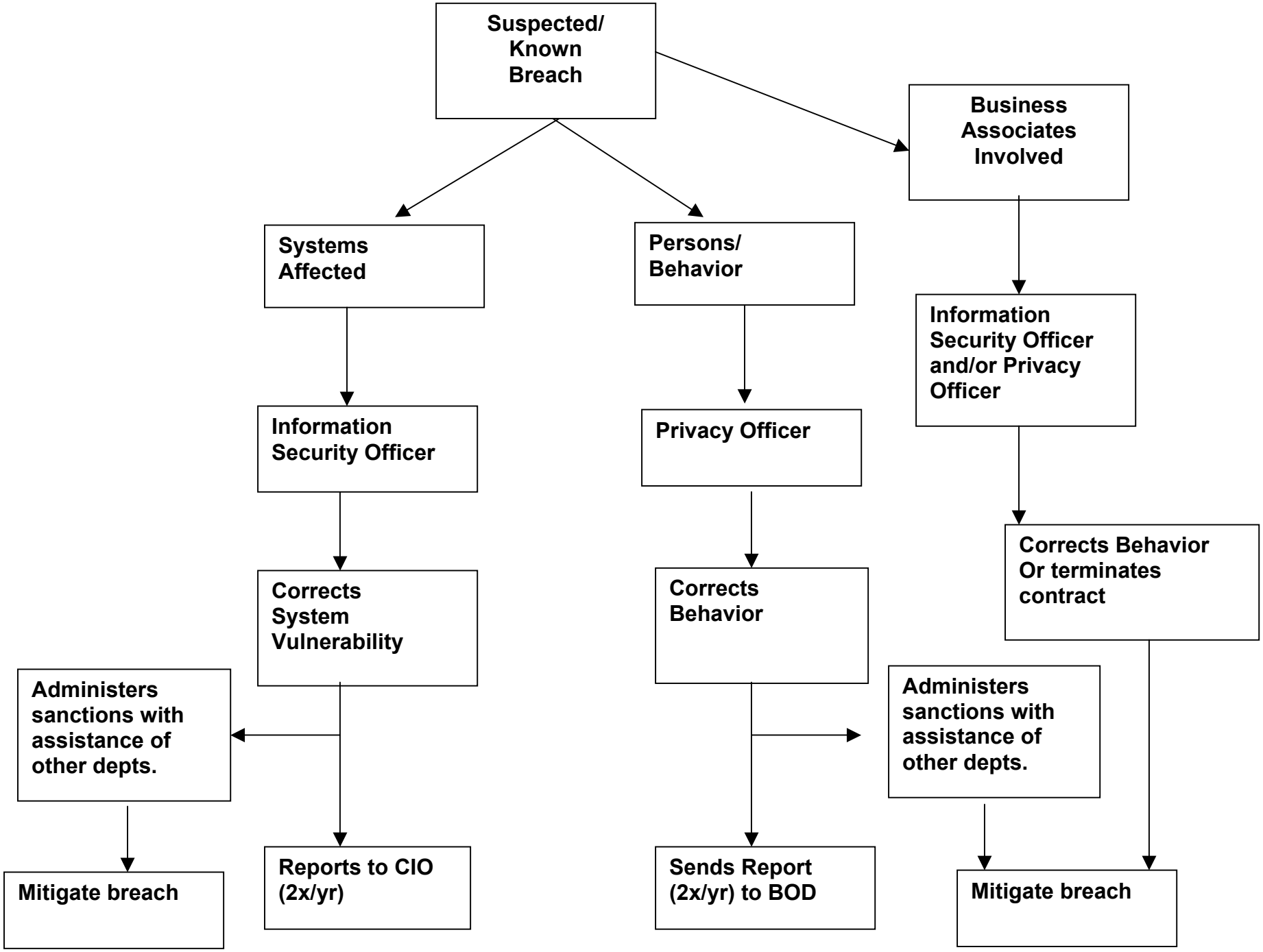# SANCTIONS FOR BREACHES OF PRIVACY & SECURITY OF PHI ADDENDUM: PROCESS