



Plan Notice, LLC

System and Organization Controls (SOC) 2 Report

Plan Notice Platform

For the Period March 1,
2025 - March 1, 2026

Advantage
PARTNERS

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Executive Summary

Plan Notice, LLC - Plan Notice Platform

Scope	Plan Notice Platform
Period of Examination	March 1, 2025 to March 1, 2026
Subservice Providers	Microsoft Azure (Azure)
Opinion Result	Unqualified
Testing Exceptions	No Exceptions Noted
Complementary Subservice Organization Controls	Yes – See Page 25
Complementary User Entity Controls	Yes – See Page 26

Section I: Independent Service Auditor's Report



Section I: Independent Service Auditor's Report

To: Management of Plan Notice, LLC

Scope

We have examined the description of the system for Plan Notice, LLC ("Plan Notice" or the "Service Organization") of its Plan Notice Platform throughout the period March 1, 2025 to March 1, 2026 (the "description") based on the criteria for a description of a service organization's system in DC section 200, *2018 Description Criteria for a Description of a Service Organization's System in a SOC 2® Report* in AICPA, *Description Criteria* ("description criteria") and the suitability of the design and operating effectiveness of controls stated in the description throughout the period March 1, 2025 to March 1, 2026, to provide reasonable assurance that Plan Notice's service commitments and system requirements were achieved based on the trust services criteria relevant to security ("applicable trust services criteria") set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria)*.

Plan Notice uses a subservice organization for cloud hosting services listed in **Section III**. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Plan Notice, to achieve Plan Notice's service commitments and system requirements based on the applicable trust services criteria. The description presents Plan Notice's controls, the applicable trust services criteria; and the types of complementary subservice organization controls assumed in the design of Plan Notice's controls. The description does not disclose the actual controls at the subservice organization. Our examination did not include the services provided by the subservice organization, and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The Description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Plan Notice, to achieve Plan Notice's service commitments and system requirements based on the applicable trust services criteria. The Description presents Plan Notice's controls; the applicable trust services criteria; and the complementary user entity controls assumed in the design of Plan Notice's controls. Our examination did not include such

complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such controls.

Service Organization's Responsibilities

The Service Organization is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that Service Organization's service commitments and system requirements were achieved. The Service Organization has provided the accompanying assertion, "Management's Assertion" in **Section II**, ("assertion") about the description and the suitability of design and operating effectiveness of controls stated therein. The Service Organization is also responsible for preparing the description and assertion, including the completeness, accuracy, and method of presentation of the description and assertion; providing the services covered by the description; selecting the applicable trust services criteria and stating the related controls in the description; and identifying the risks that threaten the achievement of the service organization's service commitments and system requirements.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the description and on the suitability of the design and operating effectiveness of the controls stated in the description based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA). Those standards require that we plan and perform our examination to obtain reasonable assurance about whether, in all material respects, the description is presented in accordance with the description criteria, and the controls stated therein were suitably designed and operating effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of the description of a service organization's system and the suitability of the design and operating effectiveness of those controls involves the following:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements;
- Assessing the risks that the description is not presented in accordance with the description criteria and that controls were not suitably designed or did not operate effectively;
- Performing procedures to obtain evidence about whether the description is presented in accordance with the description criteria;

- Performing procedures to obtain evidence about whether controls stated in the description were suitably designed to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria;
- Evaluating the overall presentation of the description.
- Testing the operating effectiveness of controls stated in the description to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria

Our examination also included performing such other procedures as we considered necessary in the circumstances.

Service Auditor's Independence and Quality Control

We have complied with the independence and other ethical requirements of the *Code of Professional Conduct* established by the AICPA. We applied the statements on quality control standards established by the AICPA, and accordingly, maintain a comprehensive system of quality control.

Inherent Limitations

The description is prepared to meet the common needs of a broad range of report users and may not, therefore, include every aspect of the system that individual users may consider important to meet their informational needs.

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls.

Because of their nature, controls may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements are achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the suitability of the design and operating effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

Description of Tests of Controls

The specific controls we tested, and the nature, timing, and results of our tests are listed in **Section IV** of this report.

Opinion

In our opinion, in all material respects,

- a. The description fairly presents the Plan Notice Platform systems of Plan Notice that was designed and implemented throughout the period March 1, 2025 to March 1, 2026 in accordance with the description criteria.
- b. The controls stated in the description were suitably designed throughout the period March 1, 2025 to March 1, 2026, to provide reasonable assurance that Plan Notice's service commitments and system requirements would be achieved based on the applicable trust services criteria, if its controls operated effectively throughout that period and if the subservice organization applied the complementary controls assumed in the design of the Service Organization's controls throughout that period.
- c. The controls stated in the description operated effectively throughout the period March 1, 2025 to March 1, 2026, to provide reasonable assurance that Plan Notice's service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls assumed in the design of the Service Organization's controls operated effectively throughout that period.

Restricted Use

This report, including the description of tests of controls and results thereof in **Section IV**, is intended solely for the information and use of Plan Notice, user entities of the in-scope services for Plan Notice's Plan Notice Platform systems during some or all of the period March 1, 2025 to March 1, 2026, business partners of Plan Notice subject to risks arising from interactions with Plan Notice system, practitioners providing services to such user entities and business partners, prospective user entities and business partners, and regulators who have sufficient knowledge and understanding of the following:

- The nature of the service provided by the Service Organization.
- How the Service Organization's system interacts with user entities, business partners, subservice organizations, and other parties.
- Internal control and its limitations.
- Complementary user entity controls and complementary subservice organization controls and how they interact with related controls at the Service Organization to achieve the Service Organization's commitments and system requirements.

- User entity responsibilities and how they may affect the user entity's ability to effectively use the Service Organization's services.
- The applicable trust services criteria.
- The risks that may threaten the achievement of the service organization's service commitments and system requirements and how controls address those risks.

This report is not intended to be, and should not, be used by anyone other than these specified parties.

Advantage Partners

April 15, 2026

Section II: Management's Assertion

Section II: Management's Assertion

Assertion of Plan Notice's Management

We have prepared the accompanying description of the Plan Notice Platform system in **Section III** of Plan Notice ("Service Organization") throughout the period March 1, 2025 to March 1, 2026 (the "period"), based on the criteria for a description of a service organization's system in DC section 200, 2018 Description Criteria for a Description of a Service Organization's System in a SOC 2® Report, in AICPA Description Criteria, ("description criteria"). The description is intended to provide users with information about Plan Notice's system that may be useful when assessing the risks arising from interactions with Plan Notice system, particularly information about system controls that Plan Notice has designed, implemented and operated to provide reasonable assurance that its service commitments and system requirements were achieved based on the trust service criteria relevant to security ("applicable trust services criteria") set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* ("trust services criteria").

The Service Organization uses subservice organizations listed in **Section III** to support its overall system. The description indicates that the complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with the controls at Plan Notice, to achieve the service commitments and system requirements based on the applicable trust service criteria. The description presents Plan Notice's controls, the applicable trust service criteria, and the complementary subservice organization controls assumed in the design of Plan Notice's controls. The description does not disclose the actual controls at the subservice organization.

The Description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Plan Notice, to achieve Plan Notice's service commitments and system requirements based on the applicable trust services criteria. The Description presents Plan Notice's controls; the applicable trust services criteria; and the complementary user entity controls assumed in the design of Plan Notice's controls. The description does not extend to the controls of the user entity.

We confirm, to the best of our knowledge and belief, that

- a. The description presents Plan Notice's system that was designed and implemented throughout the period of March 1, 2025 to March 1, 2026 in accordance with the description criteria.
- b. The controls stated in the description were suitably designed throughout the period March 1, 2025 to March 1, 2026 to provide reasonable assurance that Plan Notice's service commitments and system requirements would be achieved based on the applicable trust services criteria, if its controls operated effectively

throughout that period and if the subservice organization applied the complementary controls assumed in the design of Plan Notice's controls throughout the period.

- c. The controls stated in the description operated effectively throughout the period of March 1, 2025 to March 1, 2026 to provide reasonable assurance that Plan Notice's service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls assumed in the design of Plan Notice's controls operated effectively throughout that period.

Section III:

Description of the System

Section III: Description of the System

Company Background

Plan Notice LLC (the “Company”) was founded on July 26, 2019, by Michael Kirschman and Brian Danos. It was originally started as a company to lend funds to technology startups. In 2020 Michael and Brian realized an opportunity in the retirement plan space and changed the mission of the company from lending to development. With Michael's 25-year history in benefits oversight and consulting and Brian's 25 years of experience in product development, their combined skills fit the market and need. Plan Notice then embarked on the process of developing technology to support the Department of Labor's new guidelines on the proper distribution of regulatory notices to retirement plan participants. The organization is based out of Michael and Brian's hometown of New Orleans, Louisiana but serves clients throughout the United States.

Description of Services Overview

Plan Notice's core product is a Software as a Service (SaaS) solution that includes the following services:

- The fulfillment and tracking of all regulatory notices for retirement plans
- Location of Missing Participants
- The simplification and understandability of regulatory notices for retirement plans
- A full-service management of IRA Rollovers

Principal Service Commitments and System Requirements

Plan Notice designs its processes and procedures related to the system to meet its objectives. Those objectives are based on the service commitments defined in the Plan Notice Service Agreement to meet the rules outlined by the Department of Labor. The system services are subject to the Security commitments established internally for its services. Commitments to user entities are documented and communicated in Service Agreements and other customer agreements, as well as in the description of the service offering provided online.

Security Commitments

Security commitments include, but are not limited to, the following:

- System features and configuration settings designed to authorize user access while restricting unauthorized users from accessing information not needed for their role.
- Use of intrusion detection systems to prevent and identify potential security attacks from users outside the boundaries of the system.

- Regular vulnerability scans over the system and network, and penetration tests over the production environment.
- Operational procedures for managing security incidents and breaches, including notification procedures.
- Use of encryption technologies to protect customer data both at rest and in transit.
- Use of data retention and data disposal.

Components of the System

The System description is comprised of the following components:

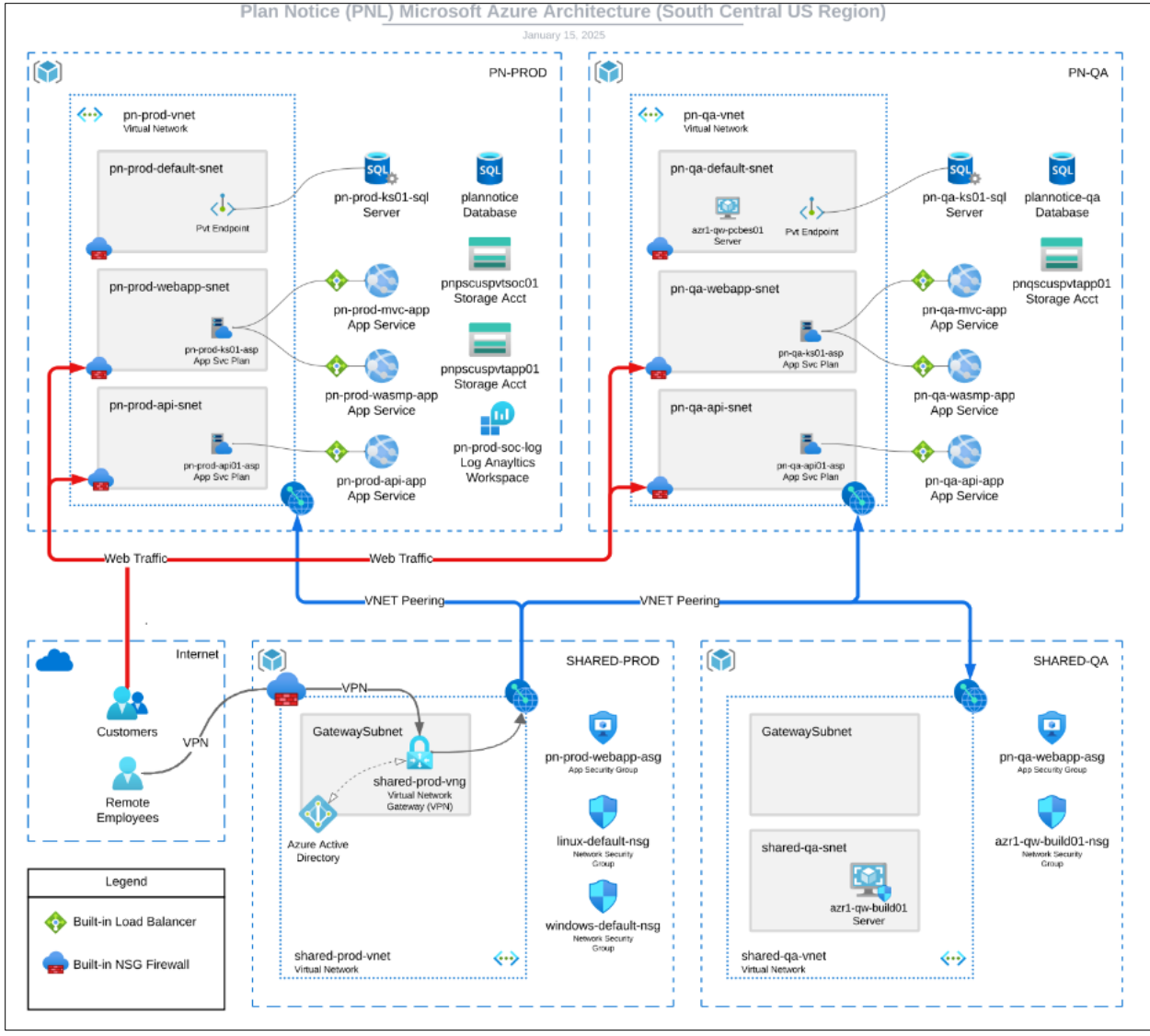
- **Infrastructure** – The collection of physical or virtual resources that supports an overall IT environment, including the physical environment and related structures, IT, and hardware (for example, facilities, servers, storage, environmental monitoring equipment, data storage devices and media, mobile devices, and internal networks and connected external telecommunications networks) that the service organization used to provide the services within their shared models
- **Software** - The application programs and IT system software that supports application programs (operating systems, middleware, and utilities), the types of databases used, the nature of external facing web applications, and the nature of applications developed in-house, including details about whether the applications in use are mobile applications or desktop or laptop applications.
- **People** - The personnel involved in the governance, operation, security, and use of a system (business unit personnel, developers, operators, user entity personnel, vendor personnel, and managers).
- **Data** – The types of data used by the system, such as transaction streams, files, databases, tables, and output used or processed by the system.
- **Procedures** – The automated and manual procedures related to the services provided, including, as appropriate, procedures by which service activities are initiated, authorized, performed, and delivered, and reports and other information prepared.

Infrastructure

Plan Notice maintains a system inventory that includes virtual machines and computers (desktops and laptops). The inventory documents device name, inventory type, description, and owner. To outline the topology of its network, the organization maintains the following network diagram.

Infrastructure	Type	Purpose
Azure	Cloud Hosting Services	Virtual Private Cloud (VPC) environment that protects the network from unauthorized external access with Plan Notice within its shared model.
Azure Dev Ops	Codebase	To store the code development

Notion	Communication Service	To communicate internal processes to the Operations Team
SharePoint	Document Storage	To retain and distribute key documentation
Microsoft O365	Email	To communicate both internally and publicly



Software

Plan Notice is responsible for managing the development and operation of its platform including infrastructure components such as servers, databases, and storage systems. The in-scope infrastructure and software components are shown in the table below:

System/Application	Operating System	Purpose
Azure Defender	Windows	Security application used for automated intrusion detection (IDS)
Sophos	Windows	Monitor individual devices
PenTest Tools	Internal	To perform penetration and vulnerability testing

People

The company employs or contracts team members to handle major product functions, including operations, and support. The IT/Engineering Team monitors the environment, as well as manages data backups and recovery. The Company focuses on hiring the right people for the right job as well as training them both on their specific tasks and on the ways to keep the company and its data secure.

Plan Notice has a staff of approximately 20 people organized in the following functional areas:

Management - Individuals who are responsible for enabling other employees to perform their jobs effectively and for maintaining security and compliance across the environment.

CEO – Michael Kirschman

COO – Brian Danos

CTO – Lowell Clark

Operations - Responsible for maintaining the availability of production infrastructure, managing access and security for production infrastructure, and supporting the client's needs. Members of the Operations team have access to the production environment and perform all the daily tasks within the system.

Information Technology - Responsible for managing laptops, software, and other technology involved in employee productivity and business operations.

Product Development - Responsible for the development, testing, deployment, and maintenance of the source code for the system. Responsible for the product life cycle, including adding additional product functionality.

Data

Data, as defined by Plan Notice, constitutes the following:

- Information provided by the client (the retirement plan) is required to communicate and identify all participants.
- Historical data showing the completion of work performed.

All sensitive data is encrypted and protected within the system. The system is not accessible by the public. Clients are provided with reports via our Operations team and can access via a secure portal.

Category	Description	Examples
Public	Public information is not confidential and can be made public without any implications for Plan Notice.	• Press releases • Public website
Internal	Access to internal information is approved by management and is protected from external access.	• Internal memos • Design documents • Product specifications • Correspondences
Customer data	Information received from customers for processing or storage by Plan Notice. Plan Notice must uphold the highest possible levels of integrity, confidentiality, and restricted availability for this information.	• Customer operating data • Customer PII • Customers' customers' PII • Anything subject to a confidentiality agreement with a customer
Company data	Information collected and used by Plan Notice to operate the business. Plan Notice must uphold the highest possible levels of integrity, confidentiality, and restricted availability for this information.	• Legal documents • Contractual agreements • Employee PII • Employee salaries

All employees and contractors of the company are obligated to respect and, in all cases, to protect customer data. Additionally, Plan Notice has policies and procedures in place to proper and secure handling of customer data. These policies and procedures are reviewed on at least an annual basis.

Processes and Procedures

Management has developed and communicated policies and procedures to manage the information security of the system. Changes to these procedures are performed annually and authorized by management, the executive team, and control owners. These procedures cover the following key security life cycle areas:

- Physical Security
- Logical Access
- Change Control
- Data Communications
- Risk Assessment
- Data Retention
- Vendor Management

Physical Security

Plan Notice's production servers are maintained in Azure. Physical and environmental security protections are the responsibility of Microsoft Azure. Plan Notice reviews the attestation reports and performs a risk analysis of Azure at least on an annual basis.

Logical Access

Plan Notice provides employees and contractors with access to infrastructure via a role-based access control system, to ensure they only have access to needed information to perform their job duties.

Access to these systems is split into four levels:

- Admin – Full access. Only granted to Executive and Management
- Operations – Limited access to Operations tasks
- Users – Very Limited access to only clients or plans that they are involved with
- No Access – No system access

User access and roles are reviewed on a quarterly basis to ensure proper privilege access is assigned.

The CEO is responsible for provisioning access to the system based on the employee's role and performing a background check. The employee is responsible for reviewing Plan Notice's policies and completing security training. These steps must be completed within 30 days of hire.

When an employee is terminated, the CEO is responsible for deprovisioning access to all in scope systems within 30 days for that employee's termination.

Computer Operations - Backups

Customer data is backed up and monitored by the CTO for completion and exceptions. If there is an exception, the CTO and COO perform troubleshooting to identify the root cause and either rerun the backup or as part of the next scheduled backup job.

Backup infrastructure is maintained in Azure with physical access restricted according to the policies. Backups are encrypted, with access restricted to key personnel.

Computer Operations - Availability

Plan Notice maintains an incident response plan to guide employees on reporting and responding to any information security or data privacy events or incidents. Procedures are in place for identifying, reporting, and acting upon breaches or other incidents.

Plan Notice internally monitors all applications, including the web UI, databases, and cloud storage to ensure that service delivery matches SLA requirements.

Plan Notice utilizes vulnerability scanning software that checks source code for common security issues as well as for vulnerabilities identified in open-source dependencies and maintains an internal SLA for responding to those issues.

Change Management

Plan Notice maintains documented Systems Development Life Cycle (SDLC) policies and procedures to guide personnel in documenting and implementing application and infrastructure changes. Change control procedures include change request and initiation processes, documentation requirements, development practices, quality assurance testing requirements, and required approval procedures.

A ticketing system is utilized to document the change control procedures for changes in the application and implementation of new changes. Quality assurance testing and User Acceptance Testing (UAT) results are documented and maintained with the associated change request. Development and testing are performed in an environment that is logically separated from the production environment. Management approves changes prior to migration to the production environment and documents those approvals within the ticketing system.

Version control software is utilized to maintain source code versions and migrate source code through the development process to the production environment. The version control software maintains a history of code changes to support rollback capabilities and tracks changes to developers.

Data Communications

Plan Notice has elected to use a platform-as-a-service (PaaS) within its shared model agreements to run its production infrastructure in part to avoid the complexity of network monitoring, configuration, and operations. The PaaS simplifies our logical network configuration by providing an effective firewall around all the Plan Notice application containers, with the only ingress from the network via HTTPS connections to designated web frontend endpoints.

The PaaS provider also automates the provisioning and de-provisioning of containers to match the desired configuration; if an application container fails, it will be automatically replaced, regardless of whether that failure is in the application or on underlying hardware.

Plan Notice engages an external security firm to perform quarterly vulnerability scans and annual penetration testing to look for unidentified vulnerabilities, and the product engineering team responds to any issues identified via the regular incident response and change management process.

Boundaries of the System

The boundaries of the Plan Notice Platform are the specific aspects of the Company's infrastructure, software, people, procedures, and data necessary to provide its services and that directly support the services provided to customers. Any infrastructure, software, people, procedures, and data that indirectly support the services provided to customers are not included within the boundaries of the Plan Notice Platform.

This report does not include the Cloud Hosting Services provided by Azure at multiple facilities.

Integrity and Ethical Values

The effectiveness of controls cannot rise above the integrity and ethical values of the people who create, administer, and monitor them. Integrity and ethical values are essential elements of Plan Notice's control environment, affecting the design, administration, and monitoring of other components. Integrity and ethical behavior are the product of Plan Notice's ethical and behavioral standards, how they are communicated, and how they are reinforced in practices. They include management's actions to remove or reduce incentives and temptations that might prompt personnel to engage in dishonest, illegal, or unethical acts. They also include the communication of entity values and behavioral standards to personnel through policy statements and codes of conduct, as well as by example.

Specific control activities that the service organization has implemented in this area are described below.

- Formally, documented organizational policy statements and codes of conduct communicate entity values and behavioral standards to personnel.
- Policies and procedures require employees to sign an acknowledgment form indicating they have been given access to the employee manual and understand their responsibility for adhering to the policies and procedures contained within the manual.
- A confidentiality statement agreeing not to disclose proprietary or confidential information, including client information, to unauthorized parties is a component of the employee handbook.
- Background checks are performed for employees as a component of the hiring process.

Commitment to Competence

Plan Notice's management defines competence as the knowledge and skills necessary to accomplish tasks that define employees' roles and responsibilities. Management's commitment to competence includes management's consideration of the competence levels for jobs and how those levels translate into the requisite skills and knowledge.

Specific control activities that the service organization has implemented in this area are described below:

- Management has considered the competence levels for particular jobs and translated required skills and knowledge levels into written position requirements.
- Training is provided to maintain the skill level of personnel in certain positions.

Management's Philosophy and Operating Style

The Plan Notice management team must balance two competing interests: continuing to grow and develop in a cutting-edge, rapidly changing technology space while remaining excellent and conservative stewards of the highly sensitive data and workflows our customers entrust to us.

The management team meets frequently to be briefed on technology changes that impact the way Plan Notice meets the expected goals of the retirement industry, as well as new security technologies that can help protect those workflows, and finally, any regulatory changes that may require Plan Notice to alter its software to maintain legal compliance. Major planned changes to the business are also reviewed by the management team to ensure they can be conducted in a way that is compatible with our core product offerings and duties to new and existing customers.

Specific control activities that the service organization has implemented in this area are described below:

- Management is periodically briefed on regulatory and industry changes affecting the services provided.
- Executive management meetings are held to discuss major initiatives and issues that affect the business.

Organizational Structure and Assignment of Authority and Responsibility

Plan Notice's organizational structure provides the framework within which its activities for achieving entity-wide objectives are planned, executed, controlled, and monitored. Management believes establishing a relevant organizational structure includes considering key areas of authority and responsibility. An organizational structure has been developed to suit its needs. This organizational structure is based, in part, on its size and the nature of its activities.

Plan Notice's assignment of authority and responsibility activities includes factors such as how authority and responsibility for operating activities are assigned and how reporting relationships and authorization hierarchies are established. It also includes policies relating to appropriate business practices, knowledge, and experience of key personnel, and resources provided for carrying out duties. In addition, it includes policies and communications directed at ensuring personnel understand the entity's

objectives, know how their actions interrelate and contribute to those objectives, and recognize how and for what they will be held accountable.

Specific control activities that the service organization has implemented in this area are described below:

- Organizational charts are in place to communicate key areas of authority and responsibility.
- Organizational charts are communicated to employees and updated as needed.

HR Policies and Practices

Plan Notice's success is founded on sound business ethics, reinforced with a high level of efficiency, integrity, and ethical standards. The result of this success is evidenced by its proven track record for hiring and retaining top-quality personnel who ensure the service organization is operating at maximum efficiency. Plan Notice's human resources policies and practices relating to employee hiring, orientation, training, evaluation, counseling, promotion, compensation, and disciplinary activities.

Specific control activities that the service organization has implemented in this area are described below:

- New employees are required to sign acknowledgment forms for the employee handbook and a confidentiality agreement following new hire orientation on their first day of employment.
- Evaluations for each employee are performed on an annual basis.
- Employee termination procedures are in place to guide the termination process and are documented in a termination checklist.

Risk Assessment Process

Plan Notice's risk assessment process identifies and manages risks that could potentially affect the company's ability to provide reliable and secure services to our customers. As part of this process, Plan Notice maintains a risk register to track all systems and procedures that could present risks to meeting the company's objectives. Risks are evaluated by likelihood and impact, and management creates tasks to address risks that score highly on both dimensions. The risk register is reevaluated annually, and tasks are incorporated into the regular Plan Notice product development process so they can be dealt with predictably and iteratively.

Integration with Risk Assessment

The environment in which the system operates; the commitments, agreements, and responsibilities of Plan Notice's system; as well as the nature of the components of the system result in risks that the criteria will not be met. Plan Notice addresses these risks through the implementation of suitably designed controls to provide reasonable

assurance that the criteria are met. Because each system and the environment in which it operates are unique, the combination of risks to meet the criteria and the controls necessary to address the risks will be unique. As part of the design and operation of the system, Plan Notice's management identifies the specific risks that the criteria will not be met and the controls necessary to address those risks.

Information and Communication Systems

Information and communication are an integral component of Plan Notice's internal control system. It is the process of identifying, capturing, and exchanging information in the form and time frame necessary to conduct, manage, and control the entity's operations.

Plan Notice uses several information and communication channels internally to share information with management, employees, contractors, and customers. Plan Notice uses chat systems and email as the primary internal and external communications channels.

Structured data is communicated internally via SaaS applications and project management tools. Finally, Plan Notice uses regular meetings to communicate company priorities and goals from management to all employees.

Monitoring Controls

Management monitors controls to ensure that they are operating as intended and that controls are modified as conditions change. Plan Notice's management performs monitoring activities to continuously assess the quality of internal control over time. Necessary corrective actions are taken as required to correct deviations from company policies and procedures. Employee activity and adherence to company policies and procedures is also monitored. This process is accomplished through ongoing monitoring activities, separate evaluations, or a combination of the two.

On-going Monitoring

Plan Notice's management conducts quality assurance monitoring on a regular basis and additional training is provided based upon results of monitoring procedures. Monitoring activities are used to initiate corrective action through department meetings, internal conference calls, and informal notifications.

Management's close involvement in Plan Notice's operations helps to identify significant variances from expectations regarding internal controls. Upper management evaluates the facts and circumstances related to any suspected control breakdown. A decision for addressing any control's weakness is made based on whether the incident was isolated or requires a change in the company's procedures or personnel. The goal of this process is to ensure legal compliance and to maximize the performance of Plan Notice's personnel.

Reporting Deficiencies

Any deficiencies or security threats are reported to the CTO or COO. Our internal ticketing system is utilized to document and track the results of on-going monitoring procedures. Escalation procedures are maintained for responding and notifying management of any identified risks, and instructions for escalation are supplied to employees in company policy documents. Risks receiving a high rating are responded to immediately. Corrective actions, if necessary, are documented and tracked within the internal tracking tool. Annual risk meetings are held for management to review reported deficiencies and corrective actions.

Changes to the System

No significant changes have occurred in our system throughout the audit period.

Incidents

No significant incidents have occurred to the services provided to users throughout the audit period.

Criteria Not Applicable to the System

All Common Criteria/Security were applicable to Plan Notice's Plan Notice Platform system.

Subservice Organizations

This report does not include the Cloud Hosting Services provided by Azure at multiple facilities.

Subservice Description of Services

The Cloud Hosting Services provided by Azure support the physical infrastructure of the entity's services.

Complementary Subservice Organization Controls

Plan Notice's services are designed with the assumption that certain controls will be implemented by subservice organizations. Such controls are called complementary subservice organization controls. It is not feasible for all the trust services criteria related to Plan Notice's services to be solely achieved by Plan Notice control procedures. Accordingly, subservice organizations, in conjunction with the services, should establish their own internal controls or procedures to complement those of Plan Notice.

Plan Notice management, along with the subservice provider, details a list of requirements to confirm high levels of ongoing security and confidentiality. Subservice organizations must also have communications policies to notify Plan Notice of any known deficiencies or vulnerability. Ongoing audits (i.e., annual SOC 2 report) must be produced by the subservice organization and reviewed by Plan Notice Management. Any concerns found in the report will be addressed to the subservice organization. Responses are documented by Plan Notice.

Subservice Organization - Azure		
Category	Criteria	Control
Security	CC 6.4	Procedures to restrict physical access to the datacenter to authorized employees, vendors, contractors, and visitors have been established.
		Security verification and check-in for personnel requiring temporary access to the interior of the datacenter facility, including tour groups or visitors, are required.
		Physical access to the datacenter is reviewed quarterly and verified by the Datacenter Management team.
		Physical access mechanisms (e.g., access card readers, biometric devices, man traps / portals, cages, locked cabinets) have been implemented and are administered to restrict access to authorized individuals.
		The datacenter facility is monitored 24x7 by security personnel.

Plan Notice management, along with the subservice provider, define the scope and responsibility of the controls necessary to meet all the relevant trust services criteria through written contracts, such as service level agreements. In addition, Plan Notice performs monitoring of the subservice organization controls, including the following procedures:

- Holding periodic discussions with vendors and subservice organizations.
- Reviewing attestation reports over services provided by vendors and subservice organizations.

Complementary User Entity Controls

Plan Notice's services are designed with the assumption that certain controls will be implemented by user entities. Such controls are called complementary user entity controls. It is not feasible for all the Trust Services Criteria related to Plan Notice's services to be solely achieved by Plan Notice control procedures. Accordingly, user entities, in conjunction with the services, should establish their own internal controls or procedures to complement those of Plan Notice's.

The following complementary user entity controls should be implemented by user entities to provide additional assurance that the Trust Services Criteria described within

this report are met. As these items represent only a part of the control considerations that might be pertinent at the user entities' locations, user entities' auditors should exercise judgment in selecting and reviewing these complementary user entity controls.

1. User entities are responsible for understanding and complying with their contractual obligations to Plan Notice.
2. User entities are responsible for notifying Plan Notice of changes made to technical or administrative contact information.
3. User entities are responsible for maintaining their own system(s) of record.
4. User entities are responsible for ensuring the supervision, management, and control of the use of Plan Notice services by their personnel.
5. User entities are responsible for developing their own disaster recovery and business continuity plans that address the inability to access or utilize Plan Notice services.
6. User entities are responsible for providing Plan Notice with a list of approvers for security and system configuration changes for data transmission.
7. User entities are responsible for immediately notifying Plan Notice of any actual or suspected information security breaches, including compromised user accounts, including those used for integrations and secure file transfers.

Section IV: Description of Criteria, Service Auditor Testing

Section IV: Description of Criteria, Service Auditor Testing

Criteria Common to All Security Principles:

Part A: Trust Criteria and Service Organization Control Activities

CC1.0 – Common Criteria Related to the Control Environment

Criteria	Plan Notice Control Activity
CC1.1 - COSO Principle 1: The entity demonstrates a commitment to integrity and ethical values.	CA-01 - The company requires contractor agreements to include a code of conduct or reference to the company code of conduct.
	CA-02 - The company requires contractors to sign a confidentiality agreement at the time of engagement.
	CA-03 - The company requires employees to sign a confidentiality agreement during onboarding.
	CA-04 - The company performs background checks on new employees.
	CA-05 - The company managers are required to complete performance evaluations for direct reports at least annually.
	CA-06 - The company requires employees to acknowledge a code of conduct at the time of hire. Employees who violate the code of conduct are subject to disciplinary actions in accordance with a disciplinary policy.
CC1.2 - COSO Principle 2: The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal control.	CA-07 - The company's board members have sufficient expertise to oversee management's ability to design, implement and operate information security controls.
	CA-08 - The company's board of directors meets at least annually and maintains formal meeting minutes.
	CA-09 - The company's board of directors or a relevant subcommittee is briefed by senior management at least annually on the state of the company's cybersecurity and privacy risk. The board provides feedback and direction to management as needed.
	CA-10 - The company's board of directors has a documented charter that outlines its oversight responsibilities for internal control.
CC1.3 - COSO Principle 3: Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives.	CA-10 - The company's board of directors has a documented charter that outlines its oversight responsibilities for internal control.
	CA-11 - The company maintains an organizational chart that describes the organizational structure and reporting lines.
	CA-12 - Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.
	CA-13 - The company management has established defined roles and responsibilities to oversee the design and implementation of information security controls.

CC1.0 – Common Criteria Related to the Control Environment

Criteria	Plan Notice Control Activity
CC1.4 - COSO Principle 4: The entity demonstrates a commitment to attract, develop, and retain competent individuals in alignment with objectives.	CA-04 - The company performs background checks on new employees. CA-05 - The company managers are required to complete performance evaluations for direct reports at least annually. CA-12 - Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy. CA-14 - The company requires employees to complete security awareness training within thirty days of hire and at least annually thereafter.
CC1.5 - COSO Principle 5: The entity holds individuals accountable for their internal control responsibilities in the pursuit of objectives.	CA-01 - The company requires contractor agreements to include a code of conduct or reference to the company code of conduct. CA-05 - The company managers are required to complete performance evaluations for direct reports at least annually. CA-06 - The company requires employees to acknowledge a code of conduct at the time of hire. Employees who violate the code of conduct are subject to disciplinary actions in accordance with a disciplinary policy. CA-12 - Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.

CC2.0 – Common Criteria Related to Communication and Information

Criteria	Plan Notice Control Activity
CC2.1 - COSO Principle 13: The entity obtains or generates and uses relevant, quality information to support the functioning of internal control	CA-15 - The company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively.
	CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation.
	CA-17 - The company utilizes a log management tool to identify events that may have a potential impact on the company's ability to achieve its security objectives.
	CA-18 - The company communicates system changes to authorized internal users.
	CA-19 - The company has established a formalized whistleblower policy, and an anonymous communication channel is in place for users to report potential issues or fraud concerns.
	CA-20 - The company provides a description of its products and services to internal and external users.
CC2.2 - COSO Principle 14: The entity internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control.	CA-21 - The company's information security policies and procedures are documented and reviewed at least annually.
	CA-12 - Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.
	CA-13 - The company management has established defined roles and responsibilities to oversee the design and implementation of information security controls.
	CA-14 - The company requires employees to complete security awareness training within thirty days of hire and at least annually thereafter.
	CA-18 - The company communicates system changes to authorized internal users.
	CA-19 - The company has established a formalized whistleblower policy, and an anonymous communication channel is in place for users to report potential issues or fraud concerns.
	CA-20 - The company provides a description of its products and services to internal and external users.
	CA-21 - The company's information security policies and procedures are documented and reviewed at least annually.
	CA-22 - The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.

CC2.0 – Common Criteria Related to Communication and Information

Criteria	Plan Notice Control Activity
CC2.3 - COSO Principle 15: The entity communicates with external parties regarding matters affecting the functioning of internal control.	CA-04 - The company performs background checks on new employees. CA-23 - The company's security commitments are communicated to customers in Master Service Agreements (MSA) or Terms of Service (TOS). CA-24 - The company provides guidelines and technical support resources relating to system operations to customers. CA-25 - The company has an external-facing support system in place that allows users to report system information on failures, incidents, concerns, and other complaints to appropriate personnel. CA-26 - The company notifies customers of critical system changes that may affect their processing. CA-27 - The company has written agreements in place with vendors and related third-parties. These agreements include confidentiality and privacy commitments applicable to that entity.

CC3.0 – Common Criteria Related to Risk Assessment

Criteria	Plan Notice Control Activity
CC3.1 - COSO Principle 6: The entity specifies objectives with sufficient clarity to enable the identification and assessment of risks relating to objectives.	CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies. CA-29 - The company specifies its objectives to enable the identification and assessment of risk related to the objectives.
CC3.2 - COSO Principle 7: The entity identifies risks to the achievement of its objectives across the entity and analyzes risks as a basis for determining how the risks should be managed.	CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies. CA-30 - The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives. CA-31 - The company has a vendor management program in place. Components of this program include: - critical third-party vendor inventory; - vendor's security and privacy requirements; and - review of critical third-party vendors at least annually. CA-32 - The company has a documented business continuity/disaster recovery (BC/DR) plan and tests it at least annually.
CC3.3 - COSO Principle 8: The entity considers the potential for fraud in assessing risks to the achievement of objectives.	CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies. CA-30 - The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.

CC3.0 – Common Criteria Related to Risk Assessment

Criteria	Plan Notice Control Activity
CC3.4 - COSO Principle 9: The entity identifies and assesses changes that could significantly impact the system of internal control.	CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies. CA-30 - The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives. CA-33 - The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs. CA-34 - The company has a configuration management procedure in place to ensure that system configurations are deployed consistently throughout the environment.

CC4.0 – Common Criteria Related to Monitoring Activities

Criteria	Plan Notice Control Activity
CC4.1 - COSO Principle 16: The entity selects, develops, and performs ongoing and/or separate evaluations to ascertain whether the components of internal control are present and functioning.	CA-15 - The company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation. CA-31 - The company has a vendor management program in place. Components of this program include: - critical third-party vendor inventory; - vendor's security and privacy requirements; and - review of critical third-party vendors at least annually. CA-33 - The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.
CC4.2 - COSO Principle 17: The entity evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate.	CA-15 - The company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. CA-31 - The company has a vendor management program in place. Components of this program include: - critical third-party vendor inventory; - vendor's security and privacy requirements; and - review of critical third-party vendors at least annually.

CC5.0 – Common Criteria Related to Control Activities

Criteria	Plan Notice Control Activity
CC5.1 - COSO Principle 10: The entity selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.	CA-21 - The company's information security policies and procedures are documented and reviewed at least annually. CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies.
CC5.2 - COSO Principle 11: The entity also selects and develops general control activities over technology to support the achievement of objectives.	CA-21 - The company's information security policies and procedures are documented and reviewed at least annually. CA-35 - The company has a formal systems development life cycle methodology in place that governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements. CA-36 - The company's access control policy documents the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access.

Criteria	Plan Notice Control Activity
CC5.3 - COSO Principle 12: The entity deploys control activities through policies that establish what is expected and in procedures that put policies into action.	CA-12 - Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy. CA-21 - The company's information security policies and procedures are documented and reviewed at least annually. CA-22 - The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users. CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies. CA-29 - The company specifies its objectives to enable the identification and assessment of risk related to the objectives. CA-31 - The company has a vendor management program in place. Components of this program include: - critical third-party vendor inventory; - vendor's security and privacy requirements; and - review of critical third-party vendors at least annually. CA-35 - The company has a formal systems development life cycle methodology in place that governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements. CA-37 - The company specifies its objectives to enable the identification and assessment of risk related to the objectives. CA-38 - The company has formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data. CA-39 - The company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment. CA-40 - The company's data backup policy documents requirements for backup and recovery of customer data.

CC6.0 – Common Criteria Related to Logical and Physical Access Controls

Criteria	Plan Notice Control Activity
CC6.1 - The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity's objectives.	CA-36 - The company's access control policy documents the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access. CA-41 - The company's datastores housing sensitive customer data are encrypted at rest. CA-42 - The company restricts privileged access to encryption keys to authorized users with a business need. CA-43 - The company restricts privileged access to the firewall to authorized users with a business need. CA-44 - The company's network is segmented to prevent unauthorized access to customer data. CA-45 - The company requires passwords for in-scope system components to be configured according to the company's policy. CA-46 - The company restricts privileged access to the application to authorized users with a business need. CA-47 - The company restricts privileged access to databases to authorized users with a business need. CA-48 - The company maintains a formal inventory of production system assets. CA-49 - The company restricts privileged access to the production network to authorized users with a business need. CA-50 - The company restricts privileged access to the operating system to authorized users with a business need. CA-51 - The company requires authentication to production datastores to use authorized secure authentication mechanisms, such as unique SSH key. CA-52 - The company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned. CA-53 - The company requires authentication to the "production network" to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys. CA-54 - The company's production systems can only be remotely accessed by authorized employees via an approved encrypted connection. CA-55 - The company's production systems can only be remotely accessed by authorized employees possessing a valid multi-factor authentication (MFA) method. CA-56 - The company restricts access to migrate changes to production to authorized personnel.

CC6.0 – Common Criteria Related to Logical and Physical Access Controls

Criteria	Plan Notice Control Activity
	CA-57 - The company has a data classification policy in place to help ensure that confidential data is properly secured and restricted to authorized personnel. CA-58 - The company requires authentication to systems and applications to use unique username and password or authorized Secure Socket Shell (SSH) keys.
CC6.2 - Prior to issuing system credentials and granting system access, the entity registers and authorizes new internal and external users whose access is administered by the entity. For those users whose access is administered by the entity, user system credentials are removed when user access is no longer authorized.	CA-36 - The company's access control policy documents the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access. CA-52 - The company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned. CA-53 - The company requires authentication to the "production network" to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys. CA-59 - The company conducts access reviews at least quarterly for the in-scope system components to help ensure that access is restricted appropriately. Required changes are tracked to completion. CA-60 - The company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.
CC6.3 - The entity authorizes, modifies, or removes access to data, software, functions, and other protected information assets based on roles, responsibilities, or the system design and changes, giving consideration to the concepts of least privilege and segregation of duties, to meet the entity's objectives.	CA-36 - The company's access control policy documents the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access. CA-52 - The company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned. CA-53 - The company requires authentication to the "production network" to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys. CA-59 - The company conducts access reviews at least quarterly for the in-scope system components to help ensure that access is restricted appropriately. Required changes are tracked to completion. CA-60 - The company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.
CC6.4 - The entity restricts physical access to facilities and protected information assets (for example, data center facilities, back-up media storage, and other sensitive locations) to authorized personnel to meet the entity's objectives.	This criterion is the responsibility of the subservice organization. Refer to the Subservice Organizations section above for controls managed by the subservice organization.

CC6.0 – Common Criteria Related to Logical and Physical Access Controls

Criteria	Plan Notice Control Activity
CC6.5 - The entity discontinues logical and physical protections over physical assets only after the ability to read or recover data and software from those assets has been diminished and is no longer required to meet the entity's objectives.	CA-38 - The company has formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data.
	CA-60 - The company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.
	CA-62 - The company has electronic media containing confidential information purged or destroyed in accordance with best practices, and certificates of destruction are issued for each device destroyed. CA-63 - The company purges or removes customer data containing confidential information from the application environment, in accordance with best practices, when customers leave the service.
CC6.6 - The entity implements logical access security measures to protect against threats from sources outside its system boundaries.	CA-53 - The company requires authentication to the "production network" to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.
	CA-54 - The company's production systems can only be remotely accessed by authorized employees via an approved encrypted connection.
	CA-55 - The company's production systems can only be remotely accessed by authorized employees possessing a valid multi-factor authentication (MFA) method.
	CA-65 - The company uses firewalls and configures them to prevent unauthorized access.
	CA-66 - The company uses secure data transmission protocols to encrypt confidential and sensitive data when transmitted over public networks.
	CA-67 - The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.
	CA-68 - The company uses an intrusion detection system to provide continuous monitoring of the company's network and early detection of potential security breaches.
CC6.7 - The entity restricts the transmission, movement, and removal of information to authorized internal and external users and processes, and protects it during transmission, movement, or removal to meet the entity's objectives.	CA-69 - The company's network and system hardening standards are documented, based on industry best practices, and reviewed at least annually.
	CA-66 - The company uses secure data transmission protocols to encrypt confidential and sensitive data when transmitted over public networks.
	CA-70 - The company has a mobile device management (MDM) system in place to centrally manage mobile devices supporting the service.
CC6.8 - The entity implements controls to prevent or detect and act	CA-71 - The company encrypts portable and removable media devices when used.
	CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to

CC6.0 – Common Criteria Related to Logical and Physical Access Controls

Criteria	Plan Notice Control Activity
upon the introduction of unauthorized or malicious software to meet the entity's objectives.	remediation. CA-35 - The company has a formal systems development life cycle methodology in place that governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements. CA-67 - The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats. CA-73 - The company deploys anti-malware technology to environments commonly susceptible to malicious attacks and configures this to be updated routinely, logged, and installed on all relevant systems.

CC7.0 – Common Criteria Related to Systems Operations

Criteria	Plan Notice Control Activity
CC7.1 - To meet its objectives, the entity uses detection and monitoring procedures to identify (1) changes to configurations that result in the introduction of new vulnerabilities, and (2) susceptibilities to newly discovered vulnerabilities.	CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation. CA-30 - The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives. CA-34 - The company has a configuration management procedure in place to ensure that system configurations are deployed consistently throughout the environment. CA-36 - The company's access control policy documents the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access. CA-39 - The company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment. CA-74 - The company's formal policies outline the requirements for the following functions related to IT / Engineering: - vulnerability management; - system monitoring.

CC7.0 – Common Criteria Related to Systems Operations

Criteria	Plan Notice Control Activity
CC7.2 - The entity monitors system components and the operation of those components for anomalies that are indicative of malicious acts, natural disasters, and errors affecting the entity's ability to meet its objectives; anomalies are analyzed to determine whether they represent security events.	CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation. CA-17 - The company utilizes a log management tool to identify events that may have a potential impact on the company's ability to achieve its security objectives. CA-33 - The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs. CA-67 - The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats. CA-68 - The company uses an intrusion detection system to provide continuous monitoring of the company's network and early detection of potential security breaches. CA-74 - The company's formal policies outline the requirements for the following functions related to IT / Engineering: - vulnerability management; - system monitoring. CA-75 - An infrastructure monitoring tool is utilized to monitor systems, infrastructure, and performance and generates alerts when specific predefined thresholds are met.
CC7.3 - The entity evaluates security events to determine whether they could or have resulted in a failure of the entity to meet its objectives (security incidents) and, if so, takes actions to prevent or address such failures.	CA-22 - The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users. CA-76 - The company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.

CC7.0 – Common Criteria Related to Systems Operations

Criteria	Plan Notice Control Activity
CC7.4 - The entity responds to identified security incidents by executing a defined incident response program to understand, contain, remediate, and communicate security incidents, as appropriate.	CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation.
	CA-22 - The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.
	CA-67 - The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.
	CA-76 - The company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.
	CA-77 - The company tests their incident response plan at least annually.
CC7.5 - The entity identifies, develops, and implements activities to recover from identified security incidents.	CA-22 - The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.
	CA-32 - The company has a documented business continuity/disaster recovery (BC/DR) plan and tests it at least annually.
	CA-76 - The company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.
	CA-77 - The company tests their incident response plan at least annually.

CC8.0 – Common Criteria Related to Change Management

Criteria	Plan Notice Control Activity
CC8.1 - The entity authorizes, designs, develops or acquires, configures, documents, tests, approves, and implements changes to infrastructure, data, software, and procedures to meet its objectives.	CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation. CA-33 - The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs. CA-35 - The company has a formal systems development life cycle methodology in place that governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements. CA-39 - The company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment. CA-56 - The company restricts access to migrate changes to production to authorized personnel. CA-67 - The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats. CA-69 - The company's network and system hardening standards are documented, based on industry best practices, and reviewed at least annually.

CC9.0 – Common Criteria Related to Risk Mitigation

Criteria	Plan Notice Control Activity
CC9.1 - The entity identifies, selects, and develops risk mitigation activities for risks arising from potential business disruptions.	CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation.
	CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies.
	CA-30 - The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.
	CA-79 - The company maintains cybersecurity insurance to mitigate the financial impact of business disruptions.
	CA-80 - The company has Business Continuity and Disaster Recovery Plans in place that outline communication plans in order to maintain information security continuity in the event of the unavailability of key personnel.
CC9.2 - The entity assesses and manages risks associated with vendors and business partners.	CA-27 - The company has written agreements in place with vendors and related third-parties. These agreements include confidentiality and privacy commitments applicable to that entity.
	CA-31 - The company has a vendor management program in place. Components of this program include: - critical third-party vendor inventory; - vendor's security and privacy requirements; and - review of critical third-party vendors at least annually.

Part B: Testing of Controls and Results

Control Activity	Tests Performed	Test Results
CA-01 - The company requires contractor agreements to include a code of conduct or reference to the company code of conduct.	Inspected the Code of Conduct to determine that the company required contractor agreements to include a code of conduct or reference to the company code of conduct. Inspected the contractor agreement for a sample of contractors to determine that the company required contractors agree to the code of conduct.	No exceptions noted.
CA-02 - The company requires contractors to sign a confidentiality agreement at the time of engagement.	Inspected the Human Resource Security Policy to determine that the company required contractors to sign a confidentiality agreement at the time of engagement. Inspected the contractor agreement for a sample of contractors to determine that the company required contractors to sign a confidentiality agreement at the time of engagement.	No exceptions noted.
CA-03 - The company requires employees to sign a confidentiality agreement during onboarding.	Inspected the Human Resource Security Policy to determine that the company required employees to sign a confidentiality agreement at the time of engagement. Inspected the employee agreement to determine that the company required employees to sign a confidentiality agreement at the time of engagement. Inspected the signed employee agreement for a sample of employees to determine that employees signed a confidentiality agreement at the time of engagement.	No exceptions noted.
CA-04 - The company performs background checks on new employees.	Inspected the Human Resource Security Policy to determine that the company required background checks on new employees. Inspected the completed background check for a sample of new hires to determine that the company required background checks on new employees.	No exceptions noted.
CA-05 - The company managers are required to complete performance evaluations for direct reports at least annually.	Inspected the Human Resource Security Policy to determine that the company managers were required to complete performance evaluations for direct reports at least annually. Inspected the completed performance reviews for a sample of employees to determine company managers completed performance evaluations for direct reports at least annually.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-06 - The company requires employees to acknowledge a code of conduct at the time of hire. Employees who violate the code of conduct are subject to disciplinary actions in accordance with a disciplinary policy.	Inspected the Code of Conduct to determine that the company required employees to acknowledge a code of conduct at the time of hire. Employees who violated the code of conduct were subject to disciplinary actions in accordance with the disciplinary policy. Inspected the Human Resource Security Policy to determine that the company required employees to acknowledge a code of conduct at the time of hire. Employees who violated the code of conduct were subject to disciplinary actions in accordance with the disciplinary policy. Inspected the signed Code of Conduct Policy for a sample of employees to determine employees agreed to the policy. Inspected the signed Human Resource Security Policy for a sample of employees to determine that employees agreed to the policy.	No exceptions noted.
CA-07 - The company's board members or a relevant subcommittee have sufficient expertise to oversee management's ability to design, implement and operate information security controls.	Inspected the board charter to determine that the company's board members had sufficient expertise to oversee management's ability to design, implement and operate information security controls. Inspected the backgrounds and experiences for a sample of board members to determine that the company's board members had sufficient expertise to oversee management's ability to design, implement and operate information security controls.	No exceptions noted.
CA-08 - The company's board of directors or a relevant subcommittee meets at least annually and maintains formal meeting minutes.	Inspected the board charter to determine that the company's board members were required to meet at least annually and maintained formal meeting minutes. Inspected the ethical management survey from management to determine that the company's management met at least annually and maintained formal meeting minutes.	No exceptions noted.
CA-09 - The company's board of directors or a relevant subcommittee is briefed by senior management at least annually on the state of the company's cybersecurity and privacy risk. The board provides feedback and direction to management as needed.	Inspected the ethical management survey to determine that the company's management or a relevant subcommittee was briefed at least annually on the state of the company's cybersecurity and privacy risk.	No exceptions noted.
CA-10 - The company's board of directors or a relevant subcommittee has a documented charter that outlines its oversight responsibilities for internal control.	Inspected the ethical management survey to determine that the company had documented the oversight responsibilities for internal control. Inspected the organizational chart to determine that the company had documented the oversight responsibilities for internal control.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-11 - The company maintains an organizational chart that describes the organizational structure and reporting lines.	Inspected the Information Security Roles and Responsibilities Policy to determine that the company documented the organizational structure and reporting lines. Inspected the organizational chart to determine that the company maintained an organizational chart that described the organizational structure and reporting lines. Inspected the ethical management survey to determine that the company had documented the outlines of the board and its oversight responsibilities for internal control.	No exceptions noted.
CA-12 - Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	Inspected the Information Security Roles and Responsibilities Policy to determine that roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls were formally assigned in job descriptions and/or the Roles and Responsibilities policy. Inspected the job description for a sample of roles to determine that roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls were formally assigned in job descriptions and/or the Roles and Responsibilities policy.	No exceptions noted.
CA-13 - The company management has established defined roles and responsibilities to oversee the design and implementation of information security controls.	Inspected the Information Security Roles and Responsibilities Policy to determine that the company management had established defined roles and responsibilities to oversee the design and implementation of information security controls. Inspected the signed Information Security Roles and Responsibilities Policy for a sample of employees to determine that employees agreed to the policy.	No exceptions noted.
CA-14 - The company requires employees to complete security awareness training within thirty days of hire and at least annually thereafter.	Inspected the Human Resource Security Policy to determine that employees were required to complete security awareness training timely after hire and on a regular cadence thereafter. Inspected the information security training program to determine that the company required current employees to complete security awareness training at least annually. Inspected the completed information security training for a sample of employees to determine that the company required current employees to complete security awareness training at least annually.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-15 - The company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. Corrective actions are taken based on relevant findings.	Inspected the Information Security Policy to determine that the company required control self-assessments at least annually to gain assurance that controls were in place and operating effectively. Corrective actions were required based on relevant findings.	No exceptions noted.
	Inspected the completed risk assessment to determine that the company performed control self-assessments at least annually to gain assurance that controls were in place and operating as expected. Corrective actions were taken based on relevant findings or in the event of an identified issue.	
	Inspected the monitoring tool configurations and an example alert to determine that the company performed control self-assessments at least annually to gain assurance that controls were in place and operating as expected. Corrective actions were taken based on relevant findings or in the event of an identified issue.	
CA-16 - Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked to remediation.	Inspected the Operation Security Policy to determine that host-based vulnerability scans were performed at least quarterly on all external-facing systems, and that critical and high vulnerabilities were tracked to remediation.	No exceptions noted.
	Inspected the vulnerability scanning configurations to determine that host-based vulnerability scans were performed at least quarterly on all external-facing systems, and that critical and high vulnerabilities were tracked to remediation.	
	Inspected the remediated vulnerability tickets for a sample of vulnerabilities found in critical systems to determine that host-based vulnerability scans were performed at least quarterly on all external-facing systems, and that critical and high vulnerabilities were tracked to remediation.	
CA-17 - The company utilizes a log management tool to identify events that may have a potential impact on the company's ability to achieve its security objectives.	Inspected the Operation Security Policy to determine that the company utilized a log management tool to identify events that may have potential impact on the company's ability to achieve its security objectives	No exceptions noted.
	Inspected the client's Azure subscription to determine that the company utilized a log management tool to identify and track events that may have potential impact on the company's ability to achieve its security objectives.	
CA-18 - The company communicates system changes to authorized internal users.	Inspected the Information Security Policy to determine that the company had established a formalized policy for communicating system changes to authorized internal users.	No exceptions noted.
	Inspected the email instructions to determine that the company communicated system changes to authorized internal users.	

Control Activity	Tests Performed	Test Results
CA-19 - The company has established a formalized whistleblower policy, and an anonymous communication channel is in place for users to report potential issues or fraud concerns.	Inspected the Information Security Policy to determine that the company had established a formalized whistle blower policy, and an anonymous communication channel was in place for users to report potential issues or fraud concerns. Inspected the anonymous reporting channel to determine that the company had established a formalized whistle blower policy, and an anonymous communication channel was in place for users to report potential issues or fraud concerns.	No exceptions noted.
CA-20 - The company provides a description of its products and services to internal and external users.	Inspected the Information Security Policy to determine that the company had established a formalized policy for providing a description of their products and services to internal and external users. Inspected the product information on the company website to determine that the company provided a description of its products and services to internal and external users. Inspected the network diagram to determine that the company provided a description of its products and services to internal and external users.	No exceptions noted.
CA-21 - The company's information security policies and procedures are documented and reviewed at least annually.	Inspected the relevant information security policies to determine that the company's information security policies and procedures were documented and reviewed at least annually. Inspected the signed company policies for a sample of employees to determine that employees agreed to the policies.	No exceptions noted.
CA-22 - The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	Inspected the Incident Response Policy to determine that the company had security and privacy incident response policies in place. Inspected the signed Incident Response Policy for a sample of employees Incident Response Policy for a sample of employees to determine employees agreed to the policy.	No exceptions noted.
CA-23 - The company's security commitments are communicated to customers in Master Service Agreements (MSA) or Terms of Service (TOS).	Inspected the master service agreement to determine that the company's security commitments were communicated to customers in a MSA or TOS. Inspected the terms of service to determine that the company's security commitments were communicated to customers in a MSA or TOS.	No exceptions noted.
CA-24 - The company provides guidelines and technical support resources relating to system operations to customers.	Inspected the company's support page to determine that the company provided guidelines and technical support resources relating to system operations to customers. Inspected the release notes to determine that the company provided guidelines and technical support resources relating to system operations to customers.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-25 - The company has an external-facing support system in place that allows users to report system information on failures, incidents, concerns, and other complaints to appropriate personnel.	Inspected the Information Security Roles and Responsibilities Policy to determine that the company has policies in place that allows users to report system information on failures, incidents, concerns, and other complaints to appropriate personnel. Inspected the company's support page to determine that the company has a system in place that allows users to report system information on failures, incidents, concerns, and other complaints to appropriate personnel.	No exceptions noted.
CA-26 - The company notifies customers of critical system changes that may affect their processing.	Inspected the Operation Security Policy to determine that the company had policies and processes on how to notify customers of critical system changes that may affect their processing. Inspected the company website to determine that the company notified customers of critical system changes that may affect their processing.	No exceptions noted.
CA-27 - The company has written agreements in place with vendors and related third-parties. These agreements include confidentiality and privacy commitments applicable to that entity.	Inspected the Privacy Policy on the company website to determine that the company publicly disclosed its confidentiality and privacy commitments. Inspected the list of vendors to determine that the company had written agreements in place with vendors and related third-parties. These agreements included confidentiality and privacy commitments applicable to that entity. Inspected the vendor agreement for a sample of critical vendors to determine that the company had written agreements in place with vendors and related third-parties. These agreements included confidentiality and privacy commitments applicable to that entity. Inspected a sample of third-party vendors to determine the company assigned risks to vendors.	No exceptions noted.
CA-28 - The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies.	Inspected the Risk Management Policy to determine that the company had a documented risk management program in place, including guidance on the identification of potential threats, rating the significance of risks associated with identified threats, and mitigation strategies for those risks. Inspected the signed Risk Management Policy for a sample of employees to determine that employees agreed to the policy.	No exceptions noted.
CA-29 - The company specifies its objectives to enable the identification and assessment of risk related to the objectives.	Inspected the Risk Management Policy to determine that the company specified its objectives to enable the identification and assessment of risk related to the objectives. Inspected the completed risk assessment to determine that the company specified its objectives to enable the identification and assessment of risk related to the objectives on an annual basis.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-30 - The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.	Inspected the Risk Management Policy to determine that the company's risk assessment was performed annually. Threats and changes to services commitments were identified and the risk were formally assessed. The risk assessment included a consideration of the potential for fraud. Inspected the completed risk assessment to determine that the company's risk assessment was performed annually. Threats and changes to services commitments were identified and the risk were formally assessed. The risk assessment included a consideration of the potential for fraud.	No exceptions noted.
CA-31 - The company has a vendor management program in place. Components of this program include: - critical third-party vendor inventory; - vendor's security and privacy requirements; and - review of critical third-party vendors at least annually.	Inspected the list of vendors to determine that the company tracks and inventories their third-party vendors. Inspected the company's policies to determine that the company had a vendor management program in place which included third-party inventory, security and privacy requirements, and review of vendors annually. Inspected the attestation report and security assessments for a sample of critical vendors to determine that the company had a vendor management program in place and included the relevant components. Inspected a sample of third-party vendors to determine the company assigned risks to vendors.	No exceptions noted.
CA-32 - The company has a documented business continuity/disaster recovery (BC/DR) plan.	Inspected the Business Continuity/Disaster Recovery Policy to determine that the company had a documented BC/DR plan. Inspected the signed Business Continuity/Disaster Recovery policy for an example employee to determine that the company had a documented BC/DR plan. Inspected the completed tabletop exercise to determine that the company had a documented BC/DR plan.	No exceptions noted.
CA-33 - The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	Inspected the Operation Security Policy to determine that the company's penetration testing was performed at least annually. A remediation plan was developed and changes were implemented to remediate vulnerabilities in accordance with SLAs. Inspected the tickets for a sample of vulnerabilities to determine that the company's penetration testing was performed at least annually. A remediation plan was developed and changes were implemented to remediate vulnerabilities in accordance with SLAs. Inspected the penetration test report to determine that the company's penetration testing was performed at least annually. A remediation plan was developed and changes were implemented to remediate vulnerabilities in accordance with SLAs.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-34 - The company has a configuration management procedure in place to ensure that system configurations are deployed consistently throughout the environment.	Inspected the Operation Security Policy to determine that the company had a configuration management procedure in place to ensure that system configurations were deployed consistently throughout the environment. Inspected the deployment system configurations and an example change to determine that the company had a configuration management procedure in place to ensure that system configurations were deployed consistently throughout the environment.	No exceptions noted.
CA-35 - The company has a formal systems development life cycle methodology in place that governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements.	Inspected the Operations Security Policy to determine that the company had a formal system development life cycle methodology in place to govern the development, acquisition, implementation, changes (including emergencies), and maintenance of information systems and related technology requirements. Inspected the signed Operations Security Policy for a sample of employees to determine that the company had a formal system development life cycle methodology in place to govern the development, acquisition, implementation, changes (including emergencies), and maintenance of information systems and related technology requirements. Inspected the Secure Development Policy to determine that the company had a formal system development life cycle methodology in place to govern the development, acquisition, implementation, changes (including emergencies), and maintenance of information systems and related technology requirements. Inspected the signed Secure Development Policy for a sample of employees to determine that the company had a formal system development life cycle methodology in place to govern the development, acquisition, implementation, changes (including emergencies), and maintenance of information systems and related technology requirements.	No exceptions noted.
CA-36 - The company's access control policy documents the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access.	Inspected the access policies of the company to determine that the company's access control policy documented the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access. Inspected the signed access policies for a sample of employees to determine that the company's access control policy documented the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access. Inspected the access request ticket for a sample of current employees to determine that the company's access control policy documented the requirements for the following access control functions including adding new users; modifying users; and/or removing an existing user's access.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-37 - The company specifies its objectives to enable the identification and assessment of risk related to the objectives.	Inspected the Risk Management Policy to determine that the company specified its objectives to enable the identification and assessment of risk related to the objectives. Inspected the completed risk assessment to determine that the company specified its objectives to enable the identification and assessment of risk related to the objectives.	No exceptions noted.
CA-38 - The company has formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data.	Inspected the company's data management policies to determine that the company had formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data. Inspected the signed data management policies for a sample of employees to determine that employees agree to the company's data management practices.	No exceptions noted.
CA-39 - The company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment.	Inspected the Operation Security Policy to determine that the company required changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment. Inspected the client's version control tool to determine that the configurations followed the defined change management process. Inspected the deployment system configurations and an example change to determine that the company required changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment. Inspected the change ticket for a sample of application changes to determine that the changes followed the defined change management process.	No exceptions noted.
CA-40 - The company's data backup policy documents requirements for backup and recovery of customer data.	Inspected the company policies to determine that the company's data backup policy documents requirements for backup and recovery of customer data. Inspected the signed company policies for a sample of employees to determine that the company's data backup policy documents requirements for backup and recovery of customer data. Inspected the completed tabletop exercise to determine that the company's data backup policy documents requirements for backup and recovery of customer data.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-41 - The company's datastores housing sensitive customer data are encrypted at rest.	Inspected the Cryptography Policy to determine that the company's datastores housing sensitive customer data were encrypted at rest. Inspected the client's Azure subscription to determine that the configurations for company datastores followed the defined encryption requirements for safeguarding customer data at rest.	No exceptions noted.
CA-42 - The company restricts privileged access to encryption keys to authorized users with a business need.	Inspected the Cryptography Policy to determine that the company restricts privileged access to encryption keys to authorized users with a business need. Inspected the company's user listings to determine that the company restricts privileged access to encryption keys to authorized users with a business need.	No exceptions noted.
CA-43 - The company restricts privileged access to the firewall to authorized users with a business need.	Inspected the Asset Management Policy to determine that the company restricted privileged access to the firewall to authorized users with a business need. Inspected the client's Azure subscription to determine that the company SSH configurations restricted privileged access to the firewall to authorized users with a business need. Inspected the user access listing and SSH keys provisioned to determine that the company SSH configurations restricted privileged access to the firewall to authorized users with a business need.	No exceptions noted.
CA-44 - The company's network is segmented to prevent unauthorized access to customer data.	Inspected the Information Security Policy to determine that the company's network was segmented from the public network to prevent unauthorized access to customer data. Inspected the network diagram to determine that the company's network was segmented from the public network to prevent unauthorized access to customer data.	No exceptions noted.
CA-45 - The company requires passwords for in-scope system components to be configured according to the company's policy.	Inspected the Access Control Policy to determine that the company required passwords for in-scope system components to be configured according to the company's policy. Inspected the signed Access Control Policy for a sample of employees to determine that employees agreed to the company's password requirements. Observed that password managers were in use on user endpoints to determine that the company required passwords for in-scope system components to be configured according to the company's policy.	No exceptions noted.
CA-46 - The company restricts privileged access to the application to authorized users with a business need.	Inspected the Access Control Policy to determine that the company restricted privileged access to the application to authorized users with a business need.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-47 - The company restricts privileged access to databases to authorized users with a business need.	Inspected the Access Control Policy to determine that the company restricted privileged access to databases to authorized users with a business need. Inspected the user listing of database administrator to determine that the company restricted privileged access to databases to authorized users with a business need.	No exceptions noted.
CA-48 - The company maintains a formal inventory of production system assets.	Inspected the Asset Management Policy to determine that the company maintained a formal inventory of production system assets. Inspected the inventory listing to determine that the company maintained a formal inventory of production system assets.	No exceptions noted.
CA-49 - The company restricts privileged access to the production network to authorized users with a business need.	Inspected the Access Control Policy to determine that the company required authentication to the production network to authorized users with a business need. Inspected the network administrator user listing to determine that the company restricted privileged access to the production network to authorized users with a business need.	No exceptions noted.
CA-50 - The company restricts privileged access to the operating system to authorized users with a business need.	Inspected the Access Control Policy to determine that the company restricted privileged access to the operating system to authorized users with a business need. Inspected the network user listing to determine that the company restricted privileged access to the operating system to authorized users with a business need.	No exceptions noted.
CA-51 - The company requires authentication to production datastores to use authorized secure authentication mechanisms, such as MFA or unique SSH key.	Inspected the Access Control Policy to determine that the company required authentication to production datastores to use authorized secure authentication mechanisms, such as unique SSH key.	No exceptions noted.
CA-52 - The company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned.	Inspected the Access Control Policy to determine that the company ensured that user access to in-scope system components was based on job role and function or required a documented access request form and manager approval prior to access being provisioned. Inspected the access request ticket for a sample of current employees to determine that the company ensured that user access to in-scope system components was based on job role and function or required a documented access request form and manager approval prior to access being provisioned.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-53 - The company requires authentication to the "production network" to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	Inspected the encryption configurations and SSL certificate to determine that the company required authentication to the production network required unique usernames and passwords or authorized SSH keys. Inspected the SSH configurations to determine that the company required authentication to the production network required unique usernames and passwords or authorized SSH keys.	No exceptions noted.
CA-54 - The company's production systems can only be remotely accessed by authorized employees via an approved encrypted connection.	Inspected the Access Control Policy to determine that the company established requirements that production systems can only be remotely accessed by authorized employees via an approved encrypted connection.	No exceptions noted.
CA-55 - The company's production systems can only be remotely accessed by authorized employees possessing a valid multi-factor authentication (MFA) method.	Inspected the Access Control Policy to determine that the company requires production systems to only be remotely accessed by authorized employees possessing a valid MFA method. Inspected the company's user listings, system and password configurations to determine that the company's production systems can only be remotely accessed by authorized employees possessing a valid MFA method.	No exceptions noted.
CA-56 - The company restricts access to migrate changes to production to authorized personnel.	Inspected the Operation Security Policy to determine that the company restricted access to migrate changes to production to authorized personnel. Inspected the Secure Development Policy to determine that the company restricted access to migrate changes to production to authorized personnel. Inspected the change tickets for a sample of application changes to determine that the company restricted access to migrate changes to production to authorized personnel. Inspected the version control configurations to determine that the company restricted access to migrate changes to production to authorized personnel.	No exceptions noted.
CA-57 - The company has a data classification policy in place to help ensure that confidential data is properly secured and restricted to authorized personnel.	Inspected the Data Management Policy to determine that the company had a data classification policy in place to help ensure that confidential data is properly secured and restricted to authorized personnel. Inspected the signed Data Management Policy for a sample of employees to determine that employees agreed to the policy.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-58 - The company requires authentication to systems and applications to use unique username and password or authorized Secure Socket Shell (SSH) keys.	Inspected the Access Control Policy to determine that the company required authentication to systems and applications to use unique username and password or authorized SSH keys. Inspected the application administrator user listing to determine that the company required authentication to systems and applications to use unique username and password or authorized SSH keys.	No exceptions noted.
CA-59 - The company conducts access reviews at least quarterly for the in-scope system components to help ensure that access is restricted appropriately. Required changes are tracked to completion.	Inspected the Access Control Policy to determine that the company conducted access reviews at least quarterly for the in-scope system components to help ensure that access was restricted appropriately. Required changes are tracked to completion. Inspected the client's cloud provider configurations to determine that the company monitors and remediates identified issues, tracking changes to completion. Inspected the customer's user listings for in-scope system components to ensure all accounts are associated with users. Inspected the client's identity provider configurations to determine that the company monitors and remediates identified issues, tracking changes to completion. Inspected the completed user access reviews for a sample of production access reviews to determine that the company conducted reviews at least quarterly for the in-scope system components to ensure that access was restricted appropriately. Required changes are tracked to completion.	No exceptions noted.
CA-60 - The company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.	Inspected the Access Control Policy to determine that the company termination checklists require access to be revoked for terminated employees within SLAs. Inspected the Employee Termination Policy to determine that the company termination checklists require access to be revoked for terminated employees within SLAs. Inspected the access reviews for selected periods to determine that terminated user accounts did not have access to in-scope systems. Inspected the company user listings and a sample of terminated users to determine that the company completed termination checklists for terminated employees and was within defined SLAs.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-62 - The company has electronic media containing confidential information purged or destroyed in accordance with best practices, and certificates of destruction are issued for each device destroyed.	Inspected the Asset Management Policy to determine that the company had electronic media containing confidential information purged or destroyed in accordance with best practices, and certificates of destruction were issued for each device destroyed. Inspected the signed Asset Management Policy for a sample of employees to determine that employees agreed to the company policy. Inspected the disposal listing for a sample of disposal requests to determine that the company had electronic media containing confidential information was purged or destroyed in accordance with best practices, and certificates of destruction were issued for each device destroyed.	Testing of this control activity disclosed that there were no media devices destroyed or purged during the review period.
CA-63 - The company purges or removes customer data containing confidential information from the application environment, in accordance with best practices, when customers leave the service.	Inspected the Data Management Policy to determine that the company requires the purge or removal of customer data containing confidential information from the application environment, in accordance with best practices, when customers leave the service. Inspected the customer deletion requests from a sample of customers to determine that the company purged or removed customer data containing confidential information from the application environment, in accordance with best practices, when customers leave the service.	Testing of this control activity disclosed that there were no customer data deletion request during the review period.
CA-65 - The company uses firewalls and configures them to prevent unauthorized access.	Inspected the company's SSH configurations to determine that the company uses firewalls and configures them to prevent unauthorized access.	No exceptions noted.
CA-66 - The company uses secure data transmission protocols to encrypt confidential and sensitive data when transmitted over public networks.	Inspected the Cryptography Policy to determine that the company had a documented process around secure data transmission protocols to encrypt confidential and sensitive data when transmitted over public networks. Inspected the SSL certificates to determine that the company used secure data transmission protocols to encrypt confidential and sensitive data when transmitted over public networks.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-67 - The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	Inspected the Operation Security Policy to determine that the company required infrastructure supporting the service patch as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers and supporting the service were hardened against security threats.	No exceptions noted.
	Inspected the vulnerability scanning configurations to determine that the company had infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service were hardened against security threats.	
	Inspected a sample of remediated vulnerabilities to determine that the company had infrastructure supporting the service patching as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service were hardened against security threats.	
CA-68 - The company uses an intrusion detection system to provide continuous monitoring of the company's network and early detection of potential security breaches.	Inspected the Operation Security Policy to determine that the company requires continuous monitoring of the company's network and early detection of potential security breaches.	No exceptions noted.
	Inspected the MDM tool dashboard to determine that the company provides continuous monitoring of the company's network and early detection of potential security breaches.	
	Inspected the client's security configurations to determine that the company provides continuous monitoring of the company's network and early detection of potential security breaches.	
	Inspected the client's Azure subscription to determine that the company provides continuous monitoring of the company's network and early detection of potential security breaches.	
CA-69 - The company's network and system hardening standards are documented, based on industry best practices, and reviewed at least annually.	Inspected the Operation Security Policy to determine that the company requires network and system hardening standards documented, based on industry best practices, and reviewed at least annually.	No exceptions noted.
	Inspected the customer's security settings and configurations to determine that the company's network and system hardening standards were documented, based on industry best practices, and reviewed at least annually.	
	Inspected the customer's annual firewall review to determine that the firewall configurations meet the company's hardening standards.	
CA-70 - The company has a mobile device management (MDM) system in place to centrally manage mobile devices supporting the service.	Inspected the Information Security Policy to determine that the company had requirements around a MDM system in place to centrally manage mobile devices supporting the service.	No exceptions noted.
	Inspected the client's MDM tool configurations to determine that the company had a MDM system in place to centrally manage mobile devices supporting the service.	

Control Activity	Tests Performed	Test Results
CA-71 - The company encrypts portable and removable media devices when used.	Inspected the Cryptography Policy to determine that the company requires encryption of portable and removable media devices when used. Inspected the endpoint encryption configurations for a sample of endpoint devices to determine that the company encrypted portable and removable media devices when used. Inspected the MDM tool for a sample of endpoint devices to determine that the company encrypted portable and removable media devices when used.	No exceptions noted.
CA-73 - The company deploys anti-malware technology to environments commonly susceptible to malicious attacks and configures this to be updated routinely, logged, and installed on all relevant systems.	Inspected the Information Security Policy to determine that the company deployed anti-malware technology to environments commonly susceptible to malicious attacks and configures this to be updated routinely, logged, and installed on all relevant systems. Inspected the MDM tool dashboard for a sample of endpoint devices to determine that the company deployed anti-malware technology to environments commonly susceptible to malicious attacks and configures this to be updated routinely, logged, and installed on all relevant systems.	No exceptions noted.
CA-74 - The company's formal policies outline the requirements for the following functions related to IT / Engineering: - vulnerability management; - system monitoring.	Inspected the company's policies to determine that the formal policies outlined the requirements for the following functions related to IT / Engineering: - vulnerability management; - system monitoring. Inspected the signed policies for a sample of employees to determine that employees agreed to the company's formal policies for the following functions related to IT / Engineering: - vulnerability management; - system monitoring.	No exceptions noted.
CA-75 - An infrastructure monitoring tool is utilized to monitor systems, infrastructure, and performance and generates alerts when specific predefined thresholds are met.	Inspected the Operation Security Policy to determine an infrastructure monitoring tool is utilized to monitor systems, infrastructure, and performance and generates alerts when specific predefined thresholds are met. Inspected the client's Azure subscription to determine an infrastructure monitoring tool is utilized to monitor systems, infrastructure, and performance and generates alerts when specific predefined thresholds are met. Inspected the load balancer configurations to determine an infrastructure monitoring tool is utilized to monitor systems, infrastructure, and performance and generates alerts when specific predefined thresholds are met.	No exceptions noted.

Control Activity	Tests Performed	Test Results
CA-76 - The company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	Inspected the Incident Response Policy to determine that the company required security and privacy incidents to be logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	No exceptions noted.
	Inspected the signed policies for a sample of employees to determine that employees agreed to the company incident response policies	
	Inspected the resolved security incidents for a sample of security incidents to determine that the company required security and privacy incidents to be logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	
CA-77 - The company tests their incident response plan at least annually.	Inspected the Incident Response Policy to determine that the company required testing their incident response plan at least annually.	No exceptions noted.
	Inspected the Incident Response Plan to determine that the company tested their incident response plan at least annually.	
CA-79 - The company maintains cybersecurity insurance to mitigate the financial impact of business disruptions.	Inspected the Operation Security Policy to determine that the company considered cybersecurity insurance to mitigate the financial impact of business disruptions.	No exceptions noted.
	Inspected the most recent insurance policy to determine that the company considered cybersecurity insurance to mitigate the financial impact of business disruptions.	
CA-80 - The company has Business Continuity and Disaster Recovery Plans in place that outline communication plans in order to maintain information security continuity in the event of the unavailability of key personnel.	Inspected the Business Continuity/Disaster Recovery policies to determine that the company had BC/DR plans in place that outlined communication plans in order to maintain information security continuity in the event of the unavailability of key personnel.	No exceptions noted.
	Inspected the signed Business Continuity/Disaster Recovery policies to determine that employees agreed to the policies.	