Access
Information Protected.®

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To: Access Clients

From: Mitchell Perry, Vice President Compliance & Security

Subject: Security & Privacy Compliance Statement

Dear Client,

Access provides full life cycle records and information management solutions in all major US markets, as well as Canada, Central America and South America. Access is a single-source partner to address all records storage, secure destruction, data protection and digital information management needs.

We continue to demonstrate our deep commitment to data privacy and protection by meeting regulatory standards for SSAE18 SOC I Type II, PCI-DSS, HIPAA, GDPR, SOX, GLBA and FERPA, and EU-US Privacy Shield Framework ("Privacy Shield"), along with maintaining industry certifications for PRISM Privacy + Standards and NAID. Through continual optimization of our resources, Access utilizes a balanced posture to ensure effective security and privacy standards are in place to protect and manage information for all of our clients. As a leader in the Records and Information Management Industry, we take this responsibility very seriously.

Access takes a principled approach to privacy, security, and compliance. The listing below highlights some of these elements.

- Comprehensive CCTV security program, monitored by a 3rd party central security station 24/7, which includes fire and intrusion detection capabilities. Security systems include door contacts, motion sensors, DVR and interior and exterior cameras.

- Physical security measures include electronic key card access, Photo ID badges, restricted access to Record & Destruction Centers, vaults and other sensitive areas, visitor management controls, non-disclosure agreements, etc.

- Pre-employment screening background of Team Members (Employees and Contractors) consists of a 7 – 10 year multi-jurisdictional criminal index search (local, state and federal), drug screening, DMV reports, exclusion, debarment and registry list checks and employment and education verification.

- Organizational policies and department SOP manuals ensure compliance standards and applicable industry requirements are satisfied.

- Annual Security and Privacy awareness training for all Team Members. Enterprise E-learning program, awareness materials, alert bulletins, Risk Oversight Committee and Executive Leadership sponsorship.

- Maintain data protection and privacy standards safeguarding client materials and personal information in accordance to applicable regulations including HIPAA, PIPEDA and GDPR.

- IT Risk Policy and Network Security Standards which encompasses access control, environmental security, protection from malware, network security, acceptable use of assets, encryption, email, remote tele-work safeguards, data centers, user responsibilities, IT monitoring, information classification, and regulations.

- Detailed incident response and case management reporting process. Disaster Recovery Plan and Business Continuity documenting response capabilities for a wide-range of contingencies including business disruptions, as well as local and regional emergency events to ensure continuity of services.

- Internal facility assessments and external audits designed to validate control measures, security practices, operational procedures, and policy requirements.

- Facilities meet all applicable local and state building codes designated for 'warehouse operations'. Buildings have been constructed with fire resistant materials and are protected with monitored fire suppression systems and environmental controls in sensitive storage areas.

- Fleet security and operational audits include vehicle inspection logs, transportation ride-along / evaluations and random field checks are used to ensure vehicles and client information are properly secured. Fuel-efficient delivery vehicles are utilized and are managed using intelligent transportation routing analytics. Vehicles are equipped with security protection and GPS tracking systems allowing for continuous, real-time monitoring.

- Active communication and intelligence sharing through ongoing interaction with professional associations and Authorities Having Jurisdiction.

- Professional memberships with industry organizations include NAID, PRISM, Shared Assessments, American Board for Homeland Security, American Society for Industrial Security, InfraGard, International Association of Privacy Professionals and Society for Corporate Compliance & Ethics.

Feel free to contact me should you have any questions or concerns.

Thank You,

Mitchell Perry
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