

Data Security Attestation Letter

As the transaction of personal information is becoming increasingly prevalent, we are aware of the importance of cyber security and the concerns driving our clients' requirements. We understand the need to be proactive in this area to establish trust that all sensitive data will be properly protected.

As a HIPAA compliant and SOC 2 certified company, Spectra is committed to keeping Personal Identifiable Information (PII) and Protected Health Information (PHI) confidential and secure. In order to provide reliable security, our company's policies and procedures follow the guidelines set by the National Institute of Standards and Technology (NIST). As security rules and regulations change or update, Spectra follows suit. We contract an AICPA member CPA firm who reviews our internal controls and evaluates our HIPAA compliance. This CPA firm will provide us a SOC 2 Type II + HIPAA report annually beginning January 2023.

Spectra is dedicated to protecting its clients' data by making sure the security on our network, systems, and interfaces are up to date. We partner with a third-party IT vendor that has been in the business for 38 years and has been thoroughly vetted by Spectra management. This vendor provides assistance, analyzes our network and systems to give update recommendations, and monitors our network and systems 24/7.

To provide added security, Spectra attests that at no time will our clients' data ever be sold or leave the United States.

We understand the seriousness and necessity of keeping our clients' data secure. Protecting our clients' data is our highest priority. Please do not hesitate to reach out with any inquiries you may have.

Alexander Engel Chief Security Officer aengel@spectraintegration.com





Walter M. Kohn President / Chief Executive Officer wkohn@spectraintegration.com

| HEADQUARTERS & PRINTING FACILITY | | |
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HIPAA Compliant Mailing

HIPAA Compliant Services

Spectra provides an all-in-one solution for printing and direct-mailing media. We provide a secure and efficient service that is cost-effective, risk-reduced, and **HIPAA** compliant. We highly value security and efficiency, in that order. Through a streamlined model, Spectra protects the confidentiality of Personal Identifiable Information (**PII**) and Protected Health Information (**PHI**) in printing and mailing, while employing stringent quality control measures.

As a **HIPAA** compliant and **SOC 2** certified company, we are able to meet the standards required by our healthcare clients. We protect the confidentiality of **PII** and **PHI** through every phase of printing and fulfillment. We make every effort to keep our clients' data secure through the mailing process. The best way we can do this is whenever applicable, use *Pressure Seal* mail pieces. This type of mail preserves confidentiality, removes chances of human error, and has high open rates with recipients.

In order to keep sensitive data confidential, Spectra has thorough security measures over its entire facility and client data. We maintain strict adherence to **HIPAA** by following our internal controls. To ensure that this data is secure in all formats, these controls cover all of our security measures including building security, controlled access to data, handling of media, and data storage procedures. Quarterly, these controls are reviewed for improvement by Spectra's executive management. Annually, an **AICPA** member **CPA** firm audits these controls for **HIPAA** compliance and evaluates Spectra's adherence to them.

To ensure these controls are followed through every step of production, all employees are trained on data security and confidentiality upon hire and refreshed annually. Spectra believes the entire team handling any project must be informed and equipped to comply with the guidelines of **HIPAA**.

Data Management Team

Our HIPAA compliance is supported and overseen by our Data Management Team.

Alexander Engel is our Chief Security Officer. He is a database developer and is responsible for client data programs and ensuring data security and integrity laws and protocols are met. Alexander builds integration between our production database and client data to provide individualized customer communication. His critical oversight to Spectra's **HIPAA** compliance gives our clients peace of mind that their **PII** and **PHI** is being properly managed. Alexander has 3 years of experience with Spectra across customer service, pre-press, mailing, digital production, and cyber security.

Brandon Redding is our Chief Technology Officer. He manages pre-production and manages mailing programs. Brandon has over 18 years of experience with Spectra across customer service, pre-press, mailing, digital production, and cyber security.

Please do not hesitate to reach out with any inquiries you may have.

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Brandon Redding Chief Technology Officer bredding@spectraintegration.com





Data Storage and Transfer Policy

As a **HIPAA** compliant and **SOC 2** certified company, Spectra is committed to keeping Personal Identifiable Information (**PII**) and Protected Health Information (**PHI**) confidential and secure. Different methods are required to secure data at rest and in transit. At rest, encryption makes data secure and unreadable without proper authorization. In transit, a Secure File Transfer Protocol (**SFTP**) provides a secure connection over which to transfer data and make the data unreadable until arriving at its authorized destination.

In order to keep sensitive data secure and confidential, Spectra adheres to the following policy and procedures which detail our security measures and explain secure data transfer options we offer our clients.

Data Storage

All sensitive data stored on our local server is in encrypted folders. Spectra establishes a unique folder for each client. Access to each folder is only authorized for users that require access for completion of the projects. These users access the data only on computers with encrypted hard drives using **FileVault** (MAC) or **BitLocker** (PC). To provide further security, we enforce two-factor authentication (**2FA**) to access our server.

Data Transfer

Spectra provides two secure file transfer options:

Option 1 – Citrix ShareFile

o Citrix ShareFile is a web-based folder that uses secure FTPS transfers and encrypts all data at rest.

Option 2 - Spectra's SFTP

o Spectra's **SFTP** is physically located at our headquarters and encrypts all data at rest.

Spectra establishes a unique folder for each client. Access to these folders is authorized for necessary client and Spectra users.

***Additional level of encryption available – Spectra utilizes individual file-based PGP encryption for many of our clients. Spectra supplies each client a public key that is used to secure their data before and during transmission. Spectra owns the private key which is the only way to unencrypt the data after transmission. ***

Spectra supports common data formats including .xlsx, .csv, .txt, and .tab. Additionally, we support .xml, .json, .dbf, and other data formats for specific client projects.

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May 25



Data Retention and Destruction Policy

As a **HIPAA** compliant and **SOC 2** certified company, Spectra is committed to keeping Personal Identifiable Information (**PII**) and Protected Health Information (**PHI**) confidential and secure.

Our clients transmit a copy of the sensitive data they store to Spectra through a Secure File Transfer Protocol (SFTP). In the printing and fulfillment industry, there is no benefit to storing our copy of sensitive data any longer than is required to complete each project. Any further retention of sensitive data would needlessly provide an additional location from which a breach could occur. Therefore, we dispose of our digital copies.

In order to keep sensitive data secure and confidential, Spectra adheres to following procedures.

Data Retention

Data Files:

Spectra stores sensitive client data following guidelines set by the National Institute of Standards and Technology (NIST) by using methods outlined in our **Data Storage and Transfer Policy**. After each project is completed, Spectra retains the data for two weeks to ensure the project was completed correctly before disposing of the data.

Physical Media:

All media that is defective or incorrectly printed and may contain **PII** or **PHI** is placed into a locked container until it is shredded.

Project History:

Spectra retains a virtual and physical record of all projects completed for up to three years.

Data Destruction

Data Files:

Two weeks following the completion of a project, Spectra deletes all sensitive data files specific to that project making the files unreadable and unrecoverable, thus compliant with **HIPAA** standards of disposal.

Physical Media / Memory Hardware:

Our sensitive printed media waste as well as our decommissioned memory hardware is shredded by an **NAID AAA** certified vendor on location.

Please do not hesitate to reach out with any inquiries you may have.

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