



Trevett's Direct, LLC

System And Organization Controls (SOC) 3

As of December 31, 2022



Management Assertion

Management's Report of Its Assertion on Its Controls Over the Trevett's Print, Mail, and Creative+ Services System Based on the AICPA Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy

We, as management of Trevett's Direct, LLC (Trevett's) are responsible for:

- Identifying the Trevett's Mail, Print, Creative+ Services System (System) and describing the boundaries of the System, presented in Attachment A
- Identifying our service commitments and system requirements
- Identifying the risks that would threaten the achievement of our service commitments and system requirements, presented in Attachment B
- Identifying, designing, implementing, operating, and monitoring effective controls over the System to mitigate risks that threaten the achievement of our service commitments and system requirements
- Selecting the trust services categories that are the basis of our assertion

Trevett's uses various subservice organizations. The description indicates that complementary subservice organization controls that are suitably designed are necessary, along with controls at Trevett's, to achieve Trevett's service commitments and system requirements based on the applicable trust services criteria.

The description presents Trevett's controls and the types of complementary subservice organization controls assumed in the design of Trevett's controls. The description excludes the controls at the subservice Organizations.

Trevett's controls were designed assuming that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Trevett's, to achieve Trevett's service commitments and system requirements based on the applicable trust services criteria. The description presents Trevett's controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of Trevett's controls.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls over the System were suitably designed and in place as of December 31, 2022, to provide reasonable assurance that the service commitments and system requirements were achieved based on the criteria relevant to security, availability, processing integrity, confidentiality, and privacy set forth in the AICPA's TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy if the complementary subservice organization controls and complementary user entity controls assumed in the design of Trevett's controls operated effectively as of December 31, 2022.

Very truly yours,

Trevett's Direct, LLC

December 31, 2022



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INDEPENDENT SERVICE AUDITOR'S REPORT

Trevett's Direct, LLC (Trevett's)
Columbia, South Carolina

Trevett's Print, Mail, and Creative+ Services System

Scope

We have examined management's assertion, contained within the accompanying "Management's Report of its Assertion on the Effectiveness of Its Controls Over the Trevett's Print, Mail, and Creative+ Services System Based on the Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy" (Assertion), that Trevett's controls over the System (System) were effective as of December 31, 2022, to provide reasonable assurance that its service commitments and system requirements were achieved based on the criteria relevant to security, availability, processing integrity, confidentiality, and privacy (applicable trust services criteria) set forth in the AICPA's TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy.

Trevett's uses various subservice organizations. The description indicates that complementary subservice organization controls that are suitably designed are necessary, along with controls at Trevett's, to achieve Trevett's service commitments and system requirements based on the applicable trust services criteria. The description presents Trevett's controls and the types of complementary subservice organization controls assumed in the design of Trevett's controls. The description does not disclose the actual controls at the subservice organizations. Our examination did not include the services provided by the subservice organizations, and we have not evaluated the suitability of the design of such complementary subservice organization controls.

Our examination was limited to examining the suitability of the design of controls as of December 31, 2022 based on controls in place as of December 31, 2022.

Management's Responsibilities

Trevett's management 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 Trevett's service commitments and system requirements were achieved. Trevett's has also provided the accompanying assertion about the controls in place within the system. When preparing its



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assertion, Trevett's is responsible for selecting, and identifying in its assertion, the applicable trust services criteria and for having a reasonable basis for its assertion by performing an assessment of the effectiveness of the controls within the system.

Our Responsibilities

Our responsibility is to express an opinion on the Assertion, 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 management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion, which includes: (1) obtaining an understanding of the system and Trevett's service commitments and system requirements, (2) assessing the risks that controls were not in place to achieve Trevett's service commitments and applicable trust services criteria, and (3) performing procedures to obtain evidence about whether controls within the system were in place to achieve Trevett's 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. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error. We believe that the evidence obtained during our examination is sufficient to provide a reasonable basis for our opinion.

Inherent limitations

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

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

Other Matter

We did not perform any procedures regarding the operating effectiveness of controls stated in the description and, accordingly, do not express an opinion thereon.



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Opinion

In our opinion, in all material respects, management's assertion that the controls within Trevett's Print, Mail, and Creative+ system were suitably designed as of December 31, 2022, to provide reasonable assurance that its service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated if the complementary subservice organization controls and complementary user entity controls assumed in the design of Trevett's controls were in place as of December 31, 2022.

JD Shirley LLC

December 31, 2022
Columbia, South Carolina



Attachment A

Trevett's Print, Mail, and Creative+ Services System



COMPANY OVERVIEW

Trevett's Direct, LLC (Trevett's), is a print, mail, graphic design, and website design company located in Columbia, South Carolina. Trevett's is a family-owned local business and was founded in 1985. Trevett's continues to serve the greater Columbia area providing the following services:

- *Print Services* include digital printing, plastic card production, digital printing, envelope printing, book binding. Trevett's offers finishing options to all print services such as:
 - Card application
 - Mechanical binding (wire-o, double loop wire)
 - Saddle stitching
 - Folding
 - Scoring
 - Mechanical collating
 - Shape cutting
 - Perfect binding
 - Tab cutting
 - Perforating
 - UV coating
- *Direct Mailing and Fulfillment Services.* Trevett's Direct Mail services include:
 - High-speed inkjet addressing
 - Bulk mail
 - CASS (Coding Accuracy Support System) certification (*address accuracy and verification*)
 - Direct mail
 - Demographic mailing list/direct mailing lists
 - Dedupe lists
 - Intelligent inserting (including closed face match inserting)
 - Mail tracking
 - NCOA (*National Change of Address*)
 - Poly mailer bags/custom poly mailer bags
 - Wafer seal
- *Creative+ Services.* Trevett's Creative+ line of business services include:
 - Web Design and Development
 - Brand Creation
 - Logo Design
 - Illustration
 - Campaign Design
 - Content Creation
 - Packaging
 - Signage



System Boundaries

The AICPA's Principles and Criteria as presented in the Trust Services Principles (TSP) Section 100, Trust Services Principles and Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy notes that a system is designed, implemented, and operated to achieve specific business objectives in accordance with management-specified requirements. Moreover, the purpose of the system description is to delineate the system boundaries. This includes the services described above and the five components described as follows: Infrastructure, Software, People, Procedures, and Data.

Infrastructure

Trevett's has designed the Print, Mail, and Creative+ System to be hosted at offsite data centers provided by subservice organizations, Google Business Cloud, Amazon Web Servers, and Digital Ocean. Google Business Cloud is a cloud computing service for the hosting of all of Trevett's applications and data on its servers thereby allowing users to access it remotely via the Internet over a secure Virtual Private Network (VPN) connection to Google web servers (Remote Hosting). Users of the Trevett's system access the system via the Internet over a secure connection to Trevett's web servers hosted in Google Business Cloud. Amazon Web Services and Digital Ocean are used by Trevett's for customer website hosting services and are accessed by users via the Internet over a secure connection.

Trevett's administrative access to all servers is accomplished through Remote Desktop Services (Remote Access). Remote access to the servers hosting Trevett's data is controlled through the Google Business Cloud, Amazon Web Services, and Digital Ocean administrative consoles and is limited to certain users within the applicable domain.

Trevett's Management receives and reviews the Google Business Cloud, Amazon Web Services, and Digital Ocean SOC reports annually as part of Management's continuous monitoring procedures.

Software

The software utilized to manage and support the Trevett's system consists of various business applications, supporting infrastructure, and support tools provided by various third-parties such as Google Business Cloud, Segra, Digital Ocean, and Amazon Web Services for performing its Print, Mail, and Creative+ services. Trevett's utilizes the aforementioned third-parties to support the monitoring, job scheduling and processing, change management, and help desk support.

People

Trevett's staff is organized in the following functional areas:

- Management and Administration
- Creative Design



- Print Operations
- Mailing Operations
- Customer Support

Procedures

Trevett's written policies and procedures define all critical aspects of the operating cycle. Policies and procedures are available to all employees through a shared network drive. Update access to policies and procedures within the shared network folder is restricted to authorized employees.

Trevett's Management evaluates the potential security and confidentiality impacts from each of the noted Trust Services Principles perspectives at periodic staff meetings and on an as-needed basis. Annual assessments of security policies, system vulnerabilities and compliance with procedures are performed and documented by Trevett's Management. Policies and procedures are reviewed and revised as needed at least annually by Trevett's Management.

Physical Security

Access to Trevett's facility is restricted by a third-party electronic badge access control system, OpenPath. All employees are granted access through the OpenPath smartphone application for their exclusive use. Trevett's Management is responsible for approving and granting all access and changes. Only authorized employees and vendors have access via OpenPath to specified areas of the building, and staff are only authorized to access areas relevant to their job responsibilities. Upon termination of employment or business agreement with a vendor, the Trevett's Management immediately revokes the facility access via the OpenPath console.

Visitors requesting entry beyond the customer areas are required to sign in and be escorted by a Trevett's employee. Visitors are required to be escorted and supervised by Trevett's staff at all times.

The Trevett's Print Center is located in the Trevett's office facility in a separate, restricted access room that has locking mechanisms on the doors and 24x7 security cameras. Access to the Print Center is controlled by OpenPath and access is restricted based on job responsibilities. All printed ID cards, printed Personally Identifiable Information (PII), and all other printed documents are stored within the secured Print Center. Only authorized Trevett's employees have access to the Print Center.

Environmental Security

The Trevett's facility, including the Print Center, has fire suppression devices, heating, ventilation, and air conditioning units (HVAC), and temperature monitoring. Fire suppression devices are inspected annually by qualified third parties.

Trevett's primary data center is operated by Google Business Cloud (Google), a subservice organization. Google provides environmental security for its data centers on behalf of Trevett's. Trevett's Management inspects the annual Google Business Cloud SOC 2 report as a monitoring control to evaluate the adequacy and operating effectiveness of Google's environmental controls.



Network Security

All communications to the Trevett's system including web applications and customer data on secure File Transfer Protocol FTP are encrypted and conducted through Secured Socket Layer (SSL) encryption (HTTPS) and initiated from the user's network. For additional security, users must provide valid credentials through a login form to gain access to web applications and data. Firewall software is installed and configured on all workstations and only Trevett's IT Team is authorized to modify the configuration.

Trevett's system requires constant access to the Internet to communicate with the Google servers. Trevett's firewall system denies unauthorized access and is configured to utilize network address translation (NAT) functionality to mask the internal IP addresses. Logs of firewall activity are monitored by the Trevett's IT Team.

Various methods of communication have been implemented to ensure that Trevett's clients understand the role and responsibilities of Trevett's in processing their transactions and to ensure that significant events are communicated to clients timely. These methods include periodic client meetings and email notification to inform users of new issues and developments as needed. Trevett's Management and other designated employees perform the aforementioned tasks and serve as a client support team.

Access to Trevett's wireless network is granted only to Trevett's employees by the Trevett's IT Team.

System Monitoring

Trevett's utilizes Segra, a subservice organization, for management and monitoring of the network firewall. Segra provides Trevett's with statistical information including notification of system anomalies. In addition, the Trevett's IT Team monitors daily security dashboards using the Google Business Cloud administration tools.

The Trevett's IT Team conduct and document an annual IT Security self-assessment. The Trevett's Management evaluates the results of the IT self-assessment and revise any policies or procedures as necessary.

Network audit, server, and firewall logs are monitored by the IT Team at least weekly and as needed for irregular, inappropriate, or unauthorized activity. Audit logs for the server, applications, and other web-based services are available and maintained within each application in a readily viewable format. Immediate follow up and appropriate remediation action is taken by the IT Team as needed.

Logical Security

Trevett's has implemented role-based security to limit and control access within the system. Employees are granted logical and physical access to systems based on Management approval. Access to Trevett's information and application systems is restricted to authorized individuals based on business need. The Trevett's IT Team manages information system accounts including establishing, activating, modifying, reviewing, disabling, and removing accounts. User access is granted using group policies (role-based) and is reviewed at least annually to verify whether individuals' access is necessary for their job functions. Trevett's employees are not authorized to change or modify user files.



Several layers of security are in place to prevent inappropriate or unauthorized access to the system and to prevent unauthorized changes. Any user attempting to access the system must provide a valid username and password. A username is assigned by the Trevett's IT Team and a password configuration policy is in place. Data and functions accessible to the user are dependent upon authority granted by the IT Team. Accordingly, a user can only view or change data approved by the IT Team. The Trevett's system incorporates the capability to assign attributes or defined traits for each user to assist the IT Team in maintaining system security. When user accounts are deactivated, the user account information is preserved in Trevett's system providing a history of activity for the user account.

Authorized Trevett's personnel use individually assigned administrative accounts to login to the system to perform administrative functions and tasks. Trevett's administrative access to the servers and databases is accomplished by remote access to the hosting server from within the firewall and is controlled through the Google Business Cloud or web application and is limited to authorized users. Annually, the Trevett's IT Team generates an active user report showing all Google Business Cloud, Amazon Web Services, Digital Ocean, Segra, Sonology NAS, and OpenPath users and their respective access. Trevett's Management performs a recertification of each user within each application and adjusts access as necessary.

All activities within the system are logged. User accounts are not deleted to ensure the retention of the activity logs for that respective user. If access for a user needs to be blocked, it is deactivated.

Customers are only provided access to a Secure FTPS folder for transmitting data to Trevett's. Customers do not have access to the Trevett's system.

Password security policies are in place within the Trevett's system for all Trevett's workstations, applications, and web-based services when available. Only the Trevett's President has the authority to modify or otherwise alter the password configuration settings. When compliance with password configuration settings for third-party software is not available, the most restrictive settings are implemented and enforced within the application.

Data Backup Procedures and Disaster Recovery

Trevett's primary data center is provided and operated by Google Business Cloud (Google). Trevett's utilizes the Google Infrastructure as a Service (IaaS). Daily backup jobs are performed for all data and application files stored in the Google Business Cloud. In addition, a duplicate onsite backup is performed on Trevett's Sonology NAS console. In the event of hardware failure or corrupted data, the production environment can be restored from backup files. The Trevett's IT Team monitors backup dashboards weekly within the Sonology NAS console to identify any backup failures. Files from backups are restored at least annually to ensure data integrity. At a minimum, the last 30 days of restore points are retained and available for recovery.

Trevett's has adopted a business continuity and disaster recovery (BCDR) strategy for planned and unplanned outages which includes recovery of customer data, applications and equipment. For data and applications, Trevett's utilizes Google Business Cloud services and the onsite Sonology NAS as an integral component of the BCDR strategy. During an outage, the data and applications are available locally via Sonology NAS and remotely via Google Business Cloud for restoration or "fail back." Trevett's maintains



agreements with other local print shops to utilize their equipment should a disaster render Trevett's equipment unusable.

Trevett's Disaster Recovery/Business Contingency Plan (the Plan) focuses on maintaining and/or rapidly recovering critical business functions that provide service to clients. All business contingency planning efforts are guided by a business contingency planning program that defines the planning and recovery processes required during an unexpected business interruption and throughout a recovery. The primary objective of the Plan is to ensure the continued operation of identified critical business systems in the event of a disaster. The specific goals of the Plan include the following: to be operational within one working day of a Plan invocation; to successfully operate throughout a Plan invocation until a standard operations site is restored or a suitable replacement center is procured; and, to minimize the disruption to Trevett's business. The Plan details a recovery approach for the technology environment. The Plan defines the roles and responsibilities for team members who are responsible for coordinating the response and recovery phases after a disaster.

Trevett's Disaster Recovery/Business Contingency Plan is periodically evaluated and revised as needed by Senior Management. Business contingency activation procedures are evaluated and tested regularly to ensure that communications, vital records, recovery systems, and necessary equipment are available and functioning correctly.

Data

Data in the Trevett's databases includes information such as: name, address, insurance enrollment coverage date, insurance member ID, Social Security Number, phone number, date of birth, and other information as presented by the various customers. Client data includes personally identifiable information and such data is considered confidential. All data is encrypted in transit and at rest.

The Trevett's Data Retention Policy is designed to ensure a reasonable and good faith retention of all records created by or under the control of Trevett's in accordance with statutory and contractual requirements. Records not considered necessary to retain are destroyed in accordance with established guidelines.

Change Management

Trevett's maintains written policies and procedures for change management. The ability to implement internal hardware, networking, or website changes is restricted to authorized personnel. Trevett's Change Management Policy addresses the process of software and web design changes as follows:

- Analysis and Planning – The Trevett's President and developers analyze and develop plans for new software, web design, and change requests.
- Design and Specifications – The developers design the changes and provide specifications to the Trevett's President.
- Coding and Verification – The developers write the code according to the requirements and specifications.



- Testing and Integration – The developers test the software changes/features using accepted testing protocol.
- Management Feedback – Senior Management, including the Trevett’s President, provide continuous feedback on the prioritization of changes

Hardware and infrastructure changes are generally requested by Trevett’s Operations staff or members of Management. The change requests are generally initiated, documented and discussed at weekly project status meetings and weekly Executive meetings with the Trevett’s President. The Trevett’s President approves all additions, deletions or modifications and major changes.

Operating systems and other purchased software are upgraded and maintained based on individual manufacturer’s user guidelines. For web-based applications and other hosting services, Trevett’s relies on the subservice organizations change controls.



Privacy Policy

Trevett's Privacy Policy

Trevett's collects only the personal information necessary to provide print, mail, and Creative+ services and support for its customers. Trevett's does not use its customers' "Data Subjects" personal information for any other reason than to provide print, mail, and Creative + services and support. Protection of data and implementation of quality standards in Business Operations policies and procedures are a fundamental Trevett's goal. Trevett's has designed controls to protect its customers' data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Trevett's does not sell or disseminate customer information to any third parties under any circumstances, except to fulfill legal regulatory requirements or to facilitate customer requested transactions.

"Data Subjects" of Trevett's customers do not have direct access to review or update their personal information collected by Trevett's. Trevett's is not under a contractual or regulatory requirement to provide Privacy notices to its customers' "Data Subjects." Trevett's is a service provider to entities (customers) as opposed to individuals. Trevett's Privacy Policy is provided and is available electronically to customers and employees. Trevett's monitors and updates its privacy policy as warranted. Changes to the Privacy Policy are infrequent and are communicated to customers and employees electronically via email.



Complementary User Entity Controls

Trevett’s services were designed with the assumption that complementary user entity controls are implemented and operating effectively in order for Trevett’s to achieve certain control activities included in description in this report. The list of complementary user entity controls presented below does not necessarily represent all controls that should be employed by all user entities. Each user entity must evaluate its own controls to determine whether complementary user entity controls have been implemented, are in place, and whether additional controls should be in place.

Complementary User Entity Controls	Controls Designed at Trevett’s with Assumption of Complementary User Entity Controls
1. Instructions and information provided to Trevett’s from customers are in accordance with the provisions of the servicing agreement between Trevett’s and the user.	These are pervasive controls and applies to all controls designed by Trevett’s to comply with customer contracts to meet its defined commitments, service-level agreements, system requirements, and other contractual and regulatory requirements.
2. Physical and logical access at user organizations is restricted to authorized individuals; each individual should be assigned a unique username; usernames and passwords should be kept secret and not shared.	
3. Data submitted to Trevett’s is appropriately authorized, complete, and accurate.	
4. Erroneous submitted data is corrected and resubmitted timely.	
5. Data transmitted to Trevett’s is encrypted and protected in accordance with regulatory and contractual requirements.	
6. Communications inside a user’s network are secure.	
7. Stored sensitive data about data subjects is minimized and meets statutory and regulatory guidelines.	



Complementary User Entity Controls	Controls Designed at Trevett's with Assumption of Complementary User Entity Controls
8. Customers provide the applicable privacy policies, notices, and changes to "data subjects." Privacy breaches and disclosures are communicated and reported to the applicable parties completely, accurately, and timely.	



Complementary Subservice Organization Controls

As noted in the table below Trevett’s uses subservice organizations to achieve operating efficiency and obtain specific expertise, for hosting, firewall, and backup services. It is not feasible for the applicable trust services criteria related to Trevett’s system to be achieved solely by Trevett’s. Each user entity’s internal controls must be evaluated in conjunction with Trevett’s controls taking into account the related complementary subservice organization controls expected to be implemented at the subservice organizations as described in the table below.

Monitoring of Subservice Organization

Management receives and reviews the subservice organizations’ SOC 2 and/or SOC 3 reports on an annual basis. In addition, through Trevett’s daily operational activities and output reports, Management monitors the services performed by the subservice organizations to ensure operations and controls expected to be in place at the subservice organizations are functioning effectively. Management also holds periodic calls and meetings, as needed, with the subservice organizations to monitor compliance with the service level agreements, stay abreast of planned changes, and relay any issues or concerns to subservice organization Management.

Company	Service	Types of Controls Expected at Subservice Organization	Other Trevett’s Monitoring Controls
Google Business Cloud Digital Ocean Amazon Web Services	Provides colocation services including data center infrastructure, physical, environmental, backup, and network security safeguards for primary servers.	Provide data hosting services including physical, environmental, and network security safeguards to support the Trevett’s system.	Trevett’s Management performs an annual review of the Google Business Cloud, Digital Ocean, and Amazon Web Services SOC 2 reports. Management researches and resolves any potential issues impacting Trevett’s. Trevett’s performs annual risk self-assessment of the Trevett’s system and applications.



Company	Service	Types of Controls Expected at Subservice Organization	Other Trevett's Monitoring Controls
Segra	Provides firewall and network security and monitoring services.	Provide firewall and network monitoring services and safeguards to support the Trevett's system.	<p>Trevett's Management performs an annual review of the Segra SOC 3 report. Management researches and resolves any potential issues impacting Trevett's.</p> <p>Trevett's reviews real-time, daily, and weekly network security logs and resolves any potential issues.</p> <p>Trevett's performs annual risk self-assessment of the Trevett's system and applications.</p>



Attachment B

Service Commitments and System Requirements



Service Commitments

Commitments are declarations made by management to customers regarding the performance of the Trevett's system. Commitments to customers are communicated via Service Level Agreements. Service Level Agreements define the security and privacy obligations which Trevett's Management and staff must meet to satisfy the organization's obligations regarding the processing and security of customer data.

System Requirements

Trevett's has implemented a process-based service quality environment designed to deliver the Print, Mail, Creative+ Services to customers. These internal policies are developed in consideration of legal and regulatory obligations, to define Trevett's organizational approach and system requirements.

The delivery of these services depends upon the appropriate internal functioning of system requirements defined by Trevett's to meet customer commitments.

The following processes and system requirements are designed to meet Trevett's commitments to customers with respect to the terms governing the security and privacy of customer data:

- Access Security: Trevett's maintains data access and logical security policies, designed to prevent unauthorized persons and/or systems from gaining access to systems used to process personal data. Access to systems is restricted based on the principle of least privilege
- Change Management: Trevett's requires standard change management procedures to be applied during the design, development, deployment, and maintenance of applications, systems, and services
- Incident Management: Trevett's monitors internal communication channels, audit logs and signals to determine the validity of security threats. Confirmed threats, including threats related to security and privacy, are escalated to Management for prompt mitigation of potential and known incidents
- Data Management: Trevett's complies with any obligations applicable to it with respect to the processing of Customer Personal Data. Trevett's processes data in accordance with agreed upon customer Service Level Agreements, and complies with applicable regulations
- Data Security: Trevett's maintains data security and privacy policies and implements technical and organizational measures to protect customer data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. Trevett's takes appropriate steps to ensure compliance with the security measures by its employees, contractors and vendors to the extent applicable to their scope of performance
- Third-Party Risk Management: Trevett's conducts an assessment of the security and privacy practices of third-party suppliers to ensure they provide a level of security and privacy appropriate to their access to data and the scope of the services they are engaged to provide.

Trevett's conducts annual inspections of its subservice organizations' SOC reports to ensure their continued compliance with the agreed-upon security and privacy requirements. Trevett's defines security and privacy practices that must be applied to the processing of data and obtains contractual commitments from suppliers to comply with these practices.

