

Our continuing efforts towards HIPAA compliance are briefed below:

| Summary of Key Controls over ePHI | | |
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| Encryption | All ePHI data whether in transit or at-rest is bound to be encrypted as per | |
| | our security policy. Log data involving ePHI is also stored under encryption | |
| Limited Access | We have strictly locked down access to ePHI as per our security policy. The | |
| | access is granted only when needed and on a temporary basis. | |
| Logging & Monitoring | All interactions (Access/Alteration/Deletion) with ePHI are logged | |
| | appropriately and are made subject to periodic reviews. | |
| Backups | All customer data is backed up real-time to multiple regions to ensure | |
| | availability of the same in case of any unforeseen events. | |

| Administrative Safeguards (see 164.308) | | |
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| Standard | Controls in Place | |
| Risk Analysis (Required) | The risk management program in place involves analyzing all technical and non-technical threats and materializing risks associated with company's assets. | |
| Risk Management (Required) | A formal risk management program is in place as per our security policy that requires security officers to perform continuous risk assessment and monitoring for already identified risks. | |
| Sanction Policy (Required) | A formal sanction policy is in place which is appropriately communicated to employees and they are required to strictly adhere to internal policies are required to avoid sanctions. | |
| Information System Activity Review (Required) | Periodic reviews are in place to identify suspicious activities. | |
| Assigned Security Responsibility (Req) | We have a dedicated security officer who is only responsibility is to ensure that PlatoForms always remains HIPAA compliant. | |
| Authorization and/or Supervision (A | All access logs are reviewed periodically as part of supervisory measure. | |
| Workforce Clearance Procedure (A) | All employee's access is reviewed and approved by independent individuals before the same are actually granted to employees. | |
| Termination Procedures (A) | Termination procedures are in place ensure that access to systems in cut-off effectively and efficiently. | |
| Isolating Health care Clearinghouse Function (Req) | Not Applicable | |
| Access Authorization (A) | As per our access management policy, a formal access request form is required to gain access to systems considering need-to-know basis. | |



| Access Establishment | All access related activities are performed by an independent resource and |
|---------------------------------|---|
| and Modification (A) | similarly are reviewed by security officer on a periodic basis. |
| Security Reminders (A) | All members of PlatoForms effectively receive the security updates on a timely basis. |
| Protection from | All endpoints are protected through end-point protection software which |
| Malicious Software (A) | are required to be installed as per our security policy. |
| Log-in Monitoring (A) | All successful and unsuccessful logins are logged for security officer's |
| | review. |
| Password Management (A) | We have policy on creating and managing passwords internally. |
| Response and Reporting | A formal incident response plan is in place to guide the internal teams over |
| (Req) | identifying, investigating, reporting, monitoring and closing incidents. |
| Data Backup Plan (Req) | A formal data backup schedule is in place which is in-line with the disaster |
| | recovery policy of the company. All backups have the duplicated cross |
| | region copy. All backups are encrypted. |
| Disaster Recovery Plan (Req) | A formally approved disaster recovery plan is in place. |
| Emergency Mode | Emergency procedures are made part of our business continuity and |
| Operation Plan (Req) | disaster recovery plan. |
| Testing and Revision | As per our policy, we are required to carry out periodic testing of backups |
| Procedure (A) | and a yearly full-scale test. |
| Applications and Data | All critical resources and systems are identified as part of our business |
| Criticality Analysis (A) | continuity plan. |
| Evaluation (Reg) | As per our policy, we conduct annual or more frequent vulnerability scans |
| | in case of any significant changes to application and supporting systems. |
| Written Contract or | All our business associates are HIPAA compliant and formal BAA are in |
| Other Arrangement | place. |
| (Req) | |
| | Physical Safeguards (see 164.310) |
| Standard | Controls in Place |
| Contingency Operations | An approved Business Continuity Plan is in place to guide employees in |
| (A) | case of any unforeseen event. |
| Facility Security Plan (A) | Our outsourced data center is HIPAA compliant and BAA is signed. |
| Access Control and | Access to office facilities is strictly controlled. Any access to our |
| Validation Procedures | infrastructure must via our VPN and the access actives are logged and |
| (A) | monitored. |
| Maintenance Records (A) | All repair and maintenance agreements are appropriately documented. |
| Workstation Use (Req) | We have an acceptable use policy in place that governs the use of official |
| | systems by employees. |
| Workstation Security | Workstation use is strictly controlled though security policy and multiple |
| (Req) | controls are in place to avoid unnecessary access to them. |
| Device and Media (Req) | We strictly prohibit the use of external media. |
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| Data Backup and Storage (A) | Real time data backups are taken and stored on geographically dispersed locations. | | |
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| Technical Safeguards (see 164.312) | | | |
| Standard | Controls in Place | | |
| Unique User Identification (Req) | All information systems and company assets are allocated unique identifiers. | | |
| Emergency Access Procedure (Req) | Emergency procedures are made part of our business continuity and disaster recovery plan. | | |
| Automatic Logoff (A) | As per security policy, systems are configured to log-off sessions after fixed internal of no-activity. | | |
| Encryption and Decryption (A) | A cryptography policy is in place that governs the use and management of encryption keys. | | |
| Audit Controls (Req) | Periodic audits are carried out to provide an independent opinion on the implemented controls. | | |
| Mechanism to Authenticate Electronic Protected (A) | All interactions with ePHI are logged to maintain the integrity of ePHI. | | |
| Person or Entity Authentication (Req) | No external access to ePHI is allowed apart from clients. A validation of clients is performed via certificates. | | |
| | Organizational Requirements (see 164.314) | | |
| Standard | Controls in Place | | |
| Business Associate Contracts (Req) | All subscribing clients are required to sign BAA as part of HIPAA compliance. | | |
| Other Arrangement s (Req) | A separate policy is in place to govern third-party relationships. | | |
| Policies and | Procedures and Documentation Requirements (see 164.316) | | |
| Standard | Controls in Place | | |
| Policies and Procedure s (Req) | Formally approved information security policy & procedures are in place. | | |
| Time Limit (Req) | ePHI is retained as per Business Associate Agreements in place or for 6 years whichever is higher. | | |
| Availability (Req) | All employees are required to adhere to the internal policies and are required to sign-off the acknowledgement accordingly. | | |
| Updates (Req) | All internal policies and procedures are reviewed and updated at least annually. | | |