



## **System and Organization Controls (SOC) 3 Report**

### **Management's Report of Its Assertions on Applied Systems, Inc.'s Applied Cloud System Based on the Trust Services Criteria for security, availability, and confidentiality**

**For the Period April 1, 2024 to September 30, 2024**





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## SECTION ONE: REPORT OF INDEPENDENT ACCOUNTANTS

To: Management of Applied Systems, Inc.

### Scope

We have examined Applied Systems, Inc. (“Applied”) accompanying assertion titled "Assertion of Applied Systems, Inc. Management" (assertion) that the controls within Applied's Applied Cloud System (system) were effective throughout the period April 1, 2024 to September 30, 2024, to provide reasonable assurance that Applied's service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, and confidentiality (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy, (With Revised Points of Focus—2022)* in *AICPA Trust Services Criteria*.

Applied uses subservice organizations to supplement its services. The description of the boundaries of the system presented in Attachment A indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Applied, to achieve Applied’s service commitments and system requirements based on the applicable trust services criteria. The description presents the types of complementary subservice organization controls assumed in the design of Applied’s controls. The description of the boundaries of the system 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 or operating effectiveness of such complementary subservice organization controls.

The description of the boundaries of the system presented in Attachment A indicates that certain complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Applied, to achieve Applied’s service commitments and system requirements based on the applicable trust services criteria. The description the complementary user entity controls assumed in the design of Applied’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*

Applied 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 Applied's service commitments and system requirements were achieved. Applied has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Applied 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.

#### *Service Auditor's Responsibilities*

Our responsibility is to express an opinion, based on our examination, on management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Our examination was conducted in accordance with attestation standards established by the 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. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements
- Assessing the risks that controls were not effective to achieve Applied's service commitments and system requirements based on the applicable trust services criteria
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve Applied'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.

#### *Inherent Limitations*

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 were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the 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.

#### *Opinion*

In our opinion, management's assertion that the controls within Applied's Applied Cloud System were effective throughout the period April 1, 2024 to September 30, 2024, to provide reasonable

assurance that Applied's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

*CyberGuard Compliance, LLP*

October 29, 2024

Las Vegas, Nevada



## **SECTION TWO: MANAGEMENT’S REPORT OF ITS ASSERTIONS ON THE EFFECTIVENESS OF ITS CONTROLS OVER APPLIED SYSTEMS, INC.’S APPLIED CLOUD SYSTEM BASED ON THE TRUST SERVICES CRITERIA FOR SECURITY, AVAILABILITY, AND CONFIDENTIALITY**

October 29, 2024

### **Scope**

We are responsible for designing, implementing, operating, and maintaining effective controls within “Applied Systems, Inc.’s (Applied's) Applied Cloud System (system)” throughout the period April 1, 2024 to September 30, 2024, to provide reasonable assurance that Applied's service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, and confidentiality (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy, (With Revised Points of Focus—2022)* in AICPA Trust Services Criteria. Our description of the boundaries of the system is presented in Attachment A (description) and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period April 1, 2024 to September 30, 2024, to provide reasonable assurance that Applied's service commitments and system requirements were achieved based on the applicable trust services criteria. Applied's objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria. The principal service commitments and system requirements related to the applicable trust services criteria are presented in Attachment B.

Applied uses subservice organizations to supplement its services. The description of the boundaries of the system indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Applied, to achieve Applied’s service commitments and system requirements based on the applicable trust services criteria. The description of the boundaries of the system does not disclose the actual controls at the subservice organizations.

The description of the boundaries of the system also indicates complementary user entity controls that are suitably designed and operating effectively are necessary along with Applied’s controls to achieve the service commitments and system requirements. The description presents the complementary user entity controls assumed in the design of Applied’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 within the system were effective throughout the period April 1, 2024 to September 30, 2024, to provide reasonable assurance that Applied's service commitments and system requirements were achieved based on the applicable trust services criteria.

*Applied Systems, Inc.*

## ATTACHMENT A: APPLIED SYSTEMS, INC.'S DESCRIPTION OF THE BOUNDARIES OF ITS APPLIED CLOUD SYSTEM

### *Company Background*

Since 1983, Applied Systems, Inc. ("Applied") has led an industry Applied helped to create with a mission to continuously improve the business of insurance. Insurance agencies and brokerages have faced new challenges and demands on their businesses over time, and Applied has been there to guide them. Applied has been at the forefront of insurance technology, leading the way through innovation. As the insurance industry becomes increasingly global, Applied is delivering new technology and expanded multinational capabilities for this changing marketplace.

Headquartered in University Park, Illinois, Applied serves 14,000 clients worldwide. Applied is a leading provider of hosted software solutions, providing applications for agencies, brokers, and insurers. These software solutions are available from a combination of Applied public, private and third-party cloud services through Applied Cloud Services ("Applied Cloud") product offerings, depending on the needs of Applied's customers. The Applied Cloud services and their related controls, including system redundancy, are key differentiators in providing and maintaining a high availability, 24/7 access for customers. The scope of this report covers the services which houses data within Applied's colocation environments and third-party cloud services located within the United States, Canada, and the United Kingdom.

Additional data center differentiators include:

- **High Availability Platform**
  - Purpose-built data centers classified as Tier 3+ as defined by the Uptime Institute;
  - Multiple Internet connections to provide redundant Internet access for Applied's clients business;
  - Excess capacity within each center to act as the disaster recovery destination for an opposing site;
  - High availability and redundancy within each site, including uninterruptable power supply and climate control;
  - Redundant firewalls and networking infrastructure; and
  - Resource pool of servers operating in a highly available cluster to allow immediate recovery for any localized failure.
- **Data Protection and Integrity**
  - All backups performed to disk targets then replicated to the data centers, ensuring that tapes are not lost, misplaced, or damaged while in transit; and
  - 24/7/365 operation, with constant monitoring and performance of first level problem resolution against the cloud environment.

- **Advanced Security**

- All databases stored in the Applied Cloud System environment leverage AES-256 data-at-rest-encryption (DARE) which is FIPS 140-2 certified,
- Network, application, and asset monitoring and testing protect data classified as personal information (also referred to as personally identifiable information or personal data).
- Internet traffic protected by a minimum of 256-bit, bi-directional, packet-level encryption; and
- Advanced building design protects the data center floor from exterior penetration, maintains complex video surveillance, strict access control policies and the use of mantraps, biometric systems and on-site security guards.

The Applied Cloud System provides clients' business with the flexibility, security, and business continuity to drive business growth and profitability. By hosting the Applied Cloud System in the cloud, clients gain best in class technology to support online product needs. Applied is committed to continually investing in the online environment to support the business growth.

### **Applied Cloud System Overview**

Applied provides market leading software applications, including Applied Epic, Applied CSR24, Applied Mobile, Applied Rating Services, IVANS Platform, Applied Benefits Designer, and other products to Applied's customers from the Applied Cloud System environment. Agency/broker management systems are provided through a Software-as-a-Service (SaaS) model, with customers purchasing software use rights for the number of users required. Each agency or brokerage management system has different operating requirements and is presented to the end user over the best delivery method to support a rich, end-user experience.

### **System Overview**

The System is comprised of the following components:

- **Infrastructure:** The physical and hardware components of a system (facilities, equipment, and networks);
- **Software:** The programs and operating software of a system (systems, applications, and utilities);
- **Data:** The information used and supported by a system (transaction streams, files, databases, and tables);
- **People:** The personnel involved in the operation and use of a system (developers, operators, users, and managers); and
- **Procedures:** The automated and manual procedures involved in the operation of a system.

## **Infrastructure**

Each Applied Cloud environment is consistently built in Applied's data centers with like technologies utilizing manufacturers including Cisco, Pure Storage, Dell, F5 Networks, VMware, Microsoft, and others. Applied owns and maintains all operating equipment within the contracted (colocation) space of the data center. At a minimum, all sites contain the following infrastructure:

- Redundant power feeds from separate UPS systems to each rack
- Multiple Internet providers using BGP and diverse paths for redundancy in Internet connectivity
- Redundant network infrastructure including firewalls, IDS/IPS, Domain & Geolocation shunning, DDoS protection, load balancers, switches, VPN devices and routers
- 10 GB network connectivity support for all core devices
- Fully virtualized server platform with servers in resource clusters based on load type
- Physical hosts redundantly connected to SAN, network, and power components
- Virtual network segmentation for products and server purpose
- Remote control technologies including managed PDU's, secure console devices and remote server out-of-band management

## **Applied Data Centers**

Applied operates the Applied Cloud System from within purpose-built colocation data centers geographically distributed to support its customers. Facilities are selected using a risk assessment process to identify locations that have a low risk of natural disaster from earthquake, flood, fire, windstorm or other severe weather conditions. Site selection also included consideration for local civil disruptions, power capacity and stability, proximity to other high risks such as railways, airports, and selective manufacturing environments. Each data center has a SOC or country equivalent conducted annually.

Each colocation facility is sited at, and managed by, a subservice organization with skilled and experienced employees to provide core facility components to Applied. These include physical security and access controls; power systems including utility power, N+1 generator power, redundant UPS systems, redundant power distribution and switching components, and redundant circuits delivered to each rack; redundant heating, ventilation, and air conditioning (HVAC) systems; dry pipe and multi-zone fire detection devices with early smoke detection capabilities; video surveillance with 24-hour monitoring; and diverse telecommunications paths into the facility.

Specific features provided by the data centers include:

- **Highly Secure Environment**
  - Multiple layers of hardened physical security
  - 24x7x365 on-site security presence
  - Closed-circuit television surveillance with digital storage

- Multiple layers of electronically controlled card access
- Keyed access to physical Applied space
- Electronic key card readers
- Facility verification of government issued photo IDs against approved access list
- **Power Distribution**
  - Commercial grade high-capacity UPS system with complete isolation for redundancy
  - Multiple 1,500+ KW generators for backup power with N+1 redundancy
  - Minimum of five days of on-site fuel supply and extended refuel contracts
  - Each circuit breaker backed by diverse power distribution units and diverse UPS infrastructures for the ultimate in uptime
  - Isolated redundant UPS configuration providing industry's highest MTBF
  - Individual circuit load monitoring to ensure the best power management
- **Environmental Control**
  - Temperature above floor maintained between 64 and 78 degrees; humidity maintained between 40 and 60 percent
  - Redundant HVAC with minimum of 30 percent reserved capacity installed
  - Sufficient air handling units for N+1 redundancy
  - Multiple glycol cooling units for N+1 redundancy
- **Fire Detection/Prevention**
  - Zoned dry-piped, pre-action sprinkler system
  - Zoned VESDA (Very Early Warning Smoke Detection) system throughout the data center
- **Private/Point-to-point network connectivity**
  - Applied provides connectivity options for VPN solutions between Applied data center and some clients' facilities, as required
  - Applied supports the use of MPLS connectivity into the Applied Cloud System environment for customers who prefer to use network connectivity with carrier provided service level agreements
- **Connectivity (Availability and selection of carriers varies by location)**
  - Diverse entry paths into each facility
    - Luman
    - Comcast
    - Zayo
    - 365 Data Centers
    - Equinix
    - eStructure Data Centers
    - Aptum

### **Software**

Applied leverages Microsoft® technologies for nearly all its virtual machine operating systems. Authentication services are provided through Microsoft Active Directory, database services are provided through Microsoft SQL Server, and web services mostly provided through Microsoft IIS. Other operating systems may be found on specialty devices, custom

hosting environments built to customer specifications, and limited infrastructure management toolsets.

Application products developed by Applied and operating from the data center include:

- **Analytics and Benefits**
  - Applied Analytics - Applied Analytics is the first analytics application designed specifically to transform an agency or brokerage's data into visual business insights, looking at all aspects of an organization's business – from operational performance to employee success, insurer relationships, and complete book of business analysis.
  - Applied Benefits Designer - Enables benefits agents to model and compare various benefit plan options in real time to guide clients to better decisions for their individual business requirement. The application rapidly models innovative benefit plans in an easy-to-understand, visual format. Agents can generate professional proposals in minutes, then guide on-the-spot conversations to quickly finalize medical, Rx and ancillary plan selections.
- **Agency and Brokerage Management Systems**
  - Applied Epic - Applied Epic is the insurance industry's fastest-growing agency and brokerage management system. Epic's modern, flexible and secure architecture provides agencies and brokerages with a single platform that scales as the Company grows.
  - Applied TAM - Applied TAM was the most-widely used agency management software in the insurance industry for business automation. For nearly 40 years, Applied TAM has provided insurance agencies and brokerages with the leading software to manage day-to-day operations across their business.
- **Mobile**
  - Applied Mobile - Applied Mobile is the first independent agent mobile application designed specifically for insurance producers. With its intuitive interface, producers can access and manage client and prospect information in their agency management system through a tablet to more effectively serve clients for increased sales and customer satisfaction. Applied Mobile includes integrated productivity and risk assessment tools that maximize producers' time and service capabilities outside the agency.
  - Applied MobileInsured - Delivers accurate, convenient access to the most current insurance information at the tap of an icon. Applied MobileInsured™ is the industry's first native, branded mobile application built specifically for agencies, so customers can interact with the business when and how they prefer. Available through Applied CSR24®, the mobile app delivers the latest policy details to clients directly on their mobile device.

- **Rating Services**
  - Applied Rating Services – Applied Rating Services is Canada’s most comprehensive rating services software for insurance brokerages. It’s a portfolio that automates rating workflows and prefills through tight integration with brokerage management systems. It improves lead management and elevates customer service through eSignature capabilities and allows them to quote their risks online anytime, anywhere through self-service quoting software.
- **Customer Self-Service**
  - Applied CSR24 - Applied CSR24 is the on-demand customer self-service application designed to allow customers instant access to their insurance information. Its customizable and secure online platform gives agencies and brokers the ability to provide personalized online client service, resulting in increased customer retention and satisfaction, while mitigating risk and reducing operating expenses to drive sustainable growth and profitability.
- **Insurer Interface**
  - Ivans Download (US only) – Ivans Download automates the exchange of policy and claims information between carrier and agency systems about renewals, endorsements, new business, cancellations, commission statements and reinstatements as well as electronic documents for more up-to-date and efficient business transactions. Ivans eServicing (US only) - Ivans eServicing allows agents to send real-time inquiries from within their management system to carrier systems about policy changes, claims information and billing for more up-to-date and efficient business transactions. Applied WARP (CN only) - Applied WARP keeps on top of the insurance market through real-time, automated data exchange with insurers. Client brokerage will be able to respond to customer inquiries, return quotes and close sales before a prospective client leaves the office or hangs up the phone.

**Data**

Applied acts as the data processor for agency, broker and carrier information stored or transmitted through the Applied Cloud System environment. Specifics include:

- Customer data stored within the Applied Cloud System environment is classified as CONFIDENTIAL to all Applied staff
- Applied stores data in one of the aforementioned data centers, which is backed-up daily and replicated to its paired site for disaster recovery
- In addition to stored/hosted data being encrypted at rest, Applied uses secure communications channels for data transmitted through the application or Web services between the end-user and the data center

- Applied destroys data from online storage after 45 days of the cancellation of a contract, and data expires from backup media in accordance with its backup retention policy

## **People**

The competence of employees is key element of the Applied Cloud System environment. Applied is committed to the development of its employees and the recruitment of qualified professionals to support the growth of Applied's business.

A dedicated team of technology professionals are responsible for the design, deployment, management, administration, and monitoring of the Applied Cloud System environments. The Cloud Services team consists of staff specializing in the storage, server, network, application, virtualization, security, monitoring, and SQL technologies. This includes but is not limited to engineers, application administrators, a 24x7x365 operations team, and DevOps resources. All teams report up through the Senior Vice President of Cloud Services.

It is the responsibility of these team members to maintain the data center and the related software applications in a working state for the Applied Cloud System customer base. This includes managing resources against capacity requirements, provisioning new orders, monitoring for system and application health, performing routine application updates and patch management at the OS and application layers, and monitoring for and assisting with the remediation of security threats.

The Cloud Services team meets on a monthly basis to discuss matters/risks pertinent to security operations and the business.

Key positions are as follows:

**Executive Vice President, Customer Experience** is responsible for Applied's customer delivery strategy and operational execution for Applied's Professional Services, Support and Cloud-based solutions.

**Chief Technical Officer (CTO)** directs the technology, architecture, and application development of Applied's products.

**Chief Information Officer & Chief Information Security Officer (CISO)** heads the Office of Information Security for Applied and relating Corporate IT services. Leads all information security related initiatives, including management of the information security program, which includes formalizing a cyber-risk management strategy, continuous governance and compliance exercises, as well as vulnerability management practices and incident response procedures.

**Senior Vice President of Cloud Services**, heads global IT operations for Applied's Cloud Hosting services and oversees the operations of Applied's four global data centers.

**Vice President of Product Operations** is responsible for developing the product roadmap for Applied Cloud administration and management applications, and consulting with the Applied application development teams to represent the unique requirements that come with hosting and updating Applied applications in the data center.

**Director of Internal Application Development** directs the technology, architecture, and application development of internal and data center information systems and integrations.

**Director of Data Center Engineering** leads the team responsible for the architecture, deployment, and support of technology within the Applied Cloud System data centers.

### **Procedures**

Applied provides multiple technology platform services to its customers from the Applied Cloud System environment through a subscription of services. These include agency and brokerage management systems, carrier interface, reporting services, and consumer-focused products.

Applied has a series of procedures to provision new subscriptions for service provided by the Applied Cloud System. These steps include:

- Setup new client entities based on executed services and business associate contracts
- Provisioning of dedicated resources if subscribed to Private Cloud Services
- Modify backup and monitoring policies to include new resources
- Verify product access is customer ready
- Setup initial authorized application administration account and provide information to customer in a secure manner

Once new system subscriptions are created and administrative users for the client account have been established within the system, the following activities occur to ensure that services are available for client use:

- Resources actively monitored for available and capacity management
- System performance metrics reviewed
- Backup and restore procedures performed
- Application updates managed
- Customer communications distributed to advise of maintenance schedules, product updates, and other relevant information
- Ongoing security management, assessments, and remediation
- Termination of access when customer cancels service, including the removal of data in accordance with the defined policy after a designated holding period

**Complementary Subservice Organization Controls**

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Certain principal service commitments and system requirements can be met only if complementary subservice organization controls (CSOC) assumed in the design of Applied’s controls are suitably designed and operating effectively at the subservice organizations, along with related controls at Applied.

**Equinix**

Applied uses Equinix, Inc. in Virginia is used for Applied Systems, Inc. colocation facility for purposes of Disaster Recovery/Business Continuity data center hosting. Applied owns and maintains all operating equipment within the colocation space of the data center. The following Complementary Subservice Organization Controls (CSOCs) are expected to be operating effectively at Equinix, alone or in combination with the controls at Applied, to provide assurance that the required trust services criteria in this report are met.

Applicable Trust Services Criteria	Complementary Subservice Organization Controls
6.4	Equinix is responsible for restricting physical access to facilities and protected information assets to authorized personnel.
A 1.2	Equinix is responsible for maintaining and monitoring environmental protections and recovery infrastructure.

**365 Data Centers**

Applied uses 365 Data Centers (formerly Sungard) in Colorado is used for Applied Systems, Inc. colocation facility for purposes of Disaster Recovery/Business Continuity data center hosting. Applied owns and maintains all operating equipment within the colocation space of the data center. The following Complementary Subservice Organization Controls (CSOCs) are expected to be operating effectively at 365 Data Centers, alone or in combination with the controls at Applied, to provide assurance that the required trust services criteria in this report are met.

Applicable Trust Services Criteria	Complementary Subservice Organization Controls
6.4	365 Data Centers is responsible for restricting physical access to facilities and protected information assets to authorized personnel.

Applicable Trust Services Criteria	Complementary Subservice Organization Controls
6.7	365 Data Centers is responsible for implementing security measures to protect information against threats during transmission, movement, or removal.
A 1.2	365 Data Centers is responsible for maintaining and monitoring environmental protections and recovery infrastructure.

**Aptum**

Applied uses Aptum Technologies in the UK is used for Applied Systems Europe Ltd./ ASE Software Ireland Ltd. colocation facility, as well as Applied Systems Canada, Inc. for purposes of DR/BC data center hosting. Applied owns and maintains all operating equipment within the colocation space of the data center The following Complementary Subservice Organization Controls (CSOCs) are expected to be operating effectively at Aptum, alone or in combination with the controls at Applied, to provide assurance that the required trust services criteria in this report are met.

Applicable Trust Services Criteria	Complementary Subservice Organization Controls
6.4	Aptum is responsible for restricting physical access to facilities and protected information assets to authorized personnel.
6.7	Aptum is responsible for implementing security measures to protect information against threats during transmission, movement, or removal.
A 1.2	Aptum is responsible for maintaining and monitoring environmental protections and recovery infrastructure.

**eStruxture**

Applied uses eStruxture Data Centers in Canada is used for Applied Systems Europe Ltd./ ASE Software Ireland Ltd. colocation facility, as well as Applied Systems Canada, Inc. for purposes of DR/BC data center hosting. Applied owns and maintains all operating equipment within the colocation space of the data center. The following Complementary Subservice Organization Controls (CSOCs) are expected to be operating effectively at eStruxture, alone or in combination with the controls at Applied, to provide assurance that the required trust services criteria in this report are met.

Applicable Trust Services Criteria	Complementary Subservice Organization Controls
6.4	eStructure is responsible for restricting physical access to facilities and protected information assets to authorized personnel.
6.7	eStructure is responsible for implementing security measures to protect information against threats during transmission, movement, or removal.
A 1.2	eStructure is responsible for maintaining and monitoring environmental protections and recovery infrastructure.

## **Complementary User Entity Controls and Responsibilities**

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### ***Complementary User Entity Controls and Responsibilities***

The Applied Software-as-a-Service model was designed with the assumption that internal controls would be placed in operation by user entities for the secure management of application access from the Applied Cloud System environment. The application of such internal controls by user entities is necessary to achieve certain criteria identified in this report. There may be additional criteria and related controls that would be appropriate for the processing of user entity transactions which are not identified in this report.

This section describes certain controls that user entities should consider for achievement of criteria identified in this report. The complementary user entity controls presented below should not be regarded as a comprehensive list of all the controls that should be employed by user entities.

#### **Provisioning Accounts**

- Users are responsible for restricting authority of provisioning new user accounts within any Applied Software-as-a-Service model application.

#### **Termination Procedures**

- Users are responsible for disabling access in a timely manner to ensure the terminated employee account access is removed.

## **Network Security**

- Users are responsible for ensuring user owned or managed applications, platforms, databases, and network devices that may process or store data derived from Applied are logically secured. Users are also responsible for Internet access to the Applied Cloud System environment.

## **General Controls**

- Users are responsible for ensuring user access to reports and other information transmitted to, or generated from, Applied is restricted based on business need.
- Users of Applied hosted applications are responsible for maintaining appropriate IT General Computer Controls and Application Controls.
- Users of Applied hosted applications are responsible for maintaining appropriate password management controls including complexity, periodic change, and minimum length.

## **Regulatory, Compliance, and Service Agreements**

- Users are responsible for adhering to all regulatory compliance issues when they are associated with Applied in a service agreement.
- Users are responsible for reviewing and approving the terms and conditions stated in service agreements with Applied.

## **ATTACHMENT B: PRINCIPAL SERVICE COMMITMENTS AND SYSTEM REQUIREMENTS**

### ***Description of Services Provided***

Applied's leading global cloud software automates the exchange of information and data throughout the insurance lifecycle among agents, brokers, insurers, and consumers throughout the United States, Canada, the Republic of Ireland, and the United Kingdom. By enabling greater access to information and streamlining workflows, Applied's customers can capitalize on new opportunities, increase the efficiency and profitability of their business, and continuously deliver the high-level service that customers expect.

The Applied portfolio consists of some of the following components:

- Applied Epic is the world's most widely used management platform. It allows agencies to manage and maintain a clear picture of their entire agency across all roles, locations and lines of business, including both P&C and benefits.
- Applied CSR24 allows for the convenience to provide self-service to customers. Its online and mobile customer self-service application is the first of its kind in the industry that keeps customers and systems connected to clients' business.
- IVANS is a technology to connect to current partners and easily access new markets and automate policy information exchange.
- Applied Mobile the ability to service customers anytime, anywhere with on-demand access to a single, up-to-date view of customer and business information at the touch of an icon.
- Applied Rating Services provides the most accurate pricing and rate comparisons for automobile and property risks.

### ***Principal Service Commitments and System Requirements***

Applied describes the services and scope of work provided to its clients through Applied software and services agreements and the organization's public website. Services and responsibilities are documented and agreed upon by both parties in the Applied Master Agreements, and contracts must be established before services are provided. Applied designs its software solutions to meet contractual commitments. These commitments are based on the services that Applied provides to its clients.

Security, availability, and confidentiality commitments are documented and communicated to customers within these agreements, which include, but are not limited to, the following:

- Maintain appropriate administrative, physical, and technical safeguards to protect the security and integrity of the Applied Cloud System and customer data in accordance with Applied's security requirements.

- Reporting on Controls at a Service Organization Relevant to Security, Availability, and Confidentiality (SOC 2) examinations.
- Use formal HR processes, including background checks, code of conduct and company policy acknowledgements, security awareness training, disciplinary processes, and annual performance reviews.
- Use of encryption technologies to protect customer data both at rest and in transit over untrusted networks.
- Use of firewalls, IP shunning devices, and network segmentation to restrict data flow.
- Infrastructure security monitoring including intrusion detection & prevention systems, centralized log management and alerting.
- Prevent malware from being introduced to production systems
- Vulnerability management program designed to identify and correct vulnerabilities within the environment in a timely manner.
- Incident Response program designed to minimize the impact of cyberattacks and protect resources.
- Geographically separated data centers with multi-layered physical security controls
- Maintain an availability SLA for customers.
- Maintain a disaster recovery and business continuity plan to ensure availability of information following an interruption or failure of critical business processes.
- Maintain and adhere to a formal incident management process, including security incident escalation procedures.
- Maintain confidentiality of customer data and notify customers in the event of a data breach.
- Identify, classify, and properly dispose of confidential data when retention period is reached and/or upon notification of customer account cancellation.

Applied establishes system and operational requirements that support the achievement of the principal service commitments, applicable laws and regulations, and other system requirements. These requirements are communicated in Applied's policies and procedures, system design documentation, and/or in customer contracts. Information Security policies define how systems and data are protected. These policies are updated as appropriate based on evolving technologies, changes to the security threat landscape, and changes to industry standards, provided any updates do not materially reduce the service commitments or overall service provided to customers as described in the customer contracts.

Applied regularly reviews the security, availability, confidentiality, and performance metrics to ensure these commitments are met. If material changes occur that reduce the level of security, availability, and confidentiality commitments within the agreement, Applied will notify the customer via the Applied's website or directly via email.