Statement of Compliance with 201 CMR 17.00

Vision Payroll's Duty to Protect and Standards for Protecting Personal Information

1. Vision Payroll has developed, implemented, and maintains a written information security policy which contains administrative, technical, and physical safeguards consistent with the safeguards for protection of personal information and information of a similar character set forth in any state or federal regulations by which it may be regulated and as appropriate to:
   a. Its size, scope and type of business;
   b. Its available resources;
   c. The amount of stored data; and
   d. The need for security and confidentiality of both consumer and employee information.
2. Vision Payroll has designated an employee to maintain the written information security policy.
3. Vision Payroll has identified and assessed reasonably foreseeable internal and external risks to the security, confidentiality, and/or integrity of any electronic, paper or other records containing personal information, and evaluated and improved, where necessary, the effectiveness of the current safeguards for limiting such risks.
4. Vision Payroll has developed security policies for employees relating to the storage, access and transportation of records containing personal information outside of business premises.
5. Vision Payroll will impose disciplinary measures for violations of the written information security program rules.
6. Vision Payroll does not allow terminated employees to access records containing personal information.
7. Vision Payroll has taken reasonable steps to select and retain third-party service providers that are capable of maintaining appropriate security measures to protect such personal information consistent with the applicable law and regulations.
8. Vision Payroll has taken reasonable steps and appropriate policies to maintain security measures to protect such personal information consistent with these the applicable law and regulations.
9. Vision Payroll has implemented and maintains such appropriate security measures for personal information that satisfies the provisions of 17.03(2)(f)(2) even if our service contract does not

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include a requirement that Vision Payroll maintain such appropriate safeguards, as long as said person entered into the contract no later than March 1, 2010.

10. Vision Payroll has made reasonable restrictions upon physical access to records containing personal information, and stores such records and data in locked facilities, storage areas or containers.
11. Vision Payroll regularly monitors to ensure that the written information security program is operating in a manner reasonably calculated to prevent unauthorized access to or unauthorized use of personal information, and upgrades information safeguards as necessary to limit risks.
12. Vision Payroll reviews the scope of the security measures at least annually or whenever there is a material change in business practices that may reasonably implicate the security or integrity of records containing personal information.
13. Vision Payroll documents responsive actions taken in connection with any incident involving a breach of security, and mandatory post-incident review of events and remediation taken, if any, to make changes in business practices relating to protection of personal information.

Vision Payroll's Computer System Security Requirements

Vision Payroll's written information security program establishes and maintains a security system covering its computers, including any mobile devices that, at a minimum, and to the extent technically feasible, has the following elements:

1. Secure user authentication protocols including:
   a. Control of user IDs and other identifiers;
   b. A reasonably secure method of assigning and selecting passwords, through the use of password complexity, password history, and a frequent password change policy;
   c. Control of data security passwords to ensure that such passwords are kept in a location and/or format that does not compromise the security of the data they protect;
   d. Restriction of access to active users and active user accounts only; and
   e. Blocking of access to user identification after multiple unsuccessful attempts to gain access or the limitation placed on access for the particular system;
2. Secure access control measures that:
   a. Restrict access to records and files containing personal information to those who need such information to perform their job duties; and

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b. Assign unique identifications plus passwords, which are not vendor supplied default passwords, to each person with computer access, that are reasonably designed to maintain the integrity of the security of the access controls;

3. Encryption of all transmitted records and files containing personal information that will travel across public networks, and encryption of all data containing personal information to be transmitted wirelessly.
4. Reasonable monitoring of systems, for unauthorized use of or access to personal information;
5. Encryption of all personal information stored on laptops or other portable devices;
6. For files containing personal information on a system that is connected to the Internet, there are reasonably up-to-date firewall protection and operating system security patches, reasonably designed to maintain the integrity of the personal information.
7. Reasonably up-to-date versions of system security agent software, which includes malware protection and reasonably up-to-date patches and virus definitions, and/or a version of such software that is supported with up-to-date patches and virus definitions, and is set to receive the most current security updates on a regular basis.
8. Education and training of employees on the proper use of the computer security system and the importance of personal information security.

This Statement of Compliance is for informational purposes only, and cannot be relied upon as a warranty or representation, whether express or implied.

If additional information is needed, please contact Vision Payroll.

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