

## Certificate of Completion of a HITRUST® Bridge Assessment for r2 Certification

August 20, 2024

Chinstrap Penguin Corporation  
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Anytown, TX 12345

Based upon the procedures performed by an Authorized External Assessor, Chinstrap Penguin, Inc. ("the Organization") has completed a HITRUST Bridge Assessment for r2 Certification. The following platforms, including referenced facilities and supporting infrastructure, were included in this HITRUST Bridge Assessment for r2 Certification:

### Scope

#### Platform:

- Customer Central (a.k.a "Portal") residing at Pelican Data Center

#### Facilities:

- CP Framingham Manufacturing Facility (Other) managed internally located in Framingham, Massachusetts, United States of America
- CP Headquarters and Manufacturing (Other) managed internally located in Las Vegas, Nevada, United States of America
- Pelican Data Center (Data Center) managed by Pelican Hosting located in Salt Lake City, Utah, United States of America

This Certificate of Completion of a HITRUST Bridge Assessment for r2 Certification ("Certificate") is valid for 90 days from the expiration of the Organization's previously issued HITRUST Risk-based, 2-year (r2) Certification ("prior certification") for the Scope which expired on August 3, 2024.

The procedures performed by the Organization's External Assessor during the Bridge assessment indicated:

- No security events, including data security breaches reportable to a federal or state agency by law or regulation, have occurred within or affecting the assessed environment that would result in the Organization no longer meet certification criteria of the HITRUST r2 Certification.

- No significant changes in the business or security policies, practices, controls, and processes have occurred that might impact its ability to continue to meet the respective HITRUST Assurance Program criteria; or where there were changes, procedures performed by the External Assessor indicate the Organization's control environment continues to meet the criteria against which the Organization was initially assessed.

## **The Organization's Responsibilities and Assertions**

Management of the Organization is responsible for the implementation, operation, and monitoring of the control environment for the Scope. Through execution of this responsibility, and submission of the HITRUST Bridge Assessment for r2 Certification to HITRUST, the Organization asserts that:

- No security event resulting in unauthorized access to the assessed environment or data housed therein, including any data security breaches occurring within or affecting the assessed environment reportable to a federal or state agency by law or regulation have occurred within or affecting the assessed environment that would result in the Organization no longer meeting certification criteria of the HITRUST r2 certification.
- No significant changes in the business or security policies, practices, controls and processes have occurred that would impact its ability to continue to meet the respective HITRUST Assurance Program certification criteria per the HITRUST Assessment Handbook.
- It is working on completing a HITRUST Risk-based, 2-year (r2) Validated Assessment for the defined Scope prior to the expiration of this Certificate.

## **External Assessor Responsibilities**

External Assessors are authorized by HITRUST based upon a thorough vetting process to demonstrate their ability to perform HITRUST CSF Assessments, and individual practitioners are required to maintain appropriate credentials based upon their role on HITRUST assessments. In a HITRUST Bridge assessment the External Assessor is responsible for:

- Reviewing and gaining a detailed understanding of the information provided by the Organization.
- Performing sufficient procedures to validate the control maturity scores provided by the Organization.

- Meeting the HITRUST Assessment criteria described within the HITRUST Assessment Handbook.

## **HITRUST Responsibilities**

HITRUST is responsible for maintenance of the HITRUST CSF and HITRUST Assurance Program against which the Organization and an External Assessor completed this assessment.

HITRUST performed a quality assurance review of this assessment to support that the control maturity scores were consistent with the results of testing performed by the External Assessor. HITRUST's quality assurance review incorporated a risk-based approach to substantiate the External Assessor's procedures were performed in accordance with the requirements of the HITRUST Assurance Program.

Additional information about the HITRUST CSF and HITRUST Assurance Program used to support this assessment can be found on the HITRUST website (<https://hitrustalliance.net>).

## **Limitations of Assurance**

This Certificate is awarded to the Organization based upon the completion of limited procedures performed by an Authorized External Assessor and reviewed by HITRUST. The nature, timing, and extent of these procedures suggest that it is unlikely the control environment maintained by Management of the Organization for the Scope has degraded since the expiration of the prior certification and is unlikely to degrade significantly for the duration of this Certificate.

However, the procedures executed by the External Assessor during the HITRUST Bridge Assessment for r2 Certification were not designed to and would not detect all changes in the control environment for the Scope, some of which could be considered material to the Organization's stakeholders.

A HITRUST Bridge Assessment for r2 Certification does not offer the same assurances to the Organization's stakeholders as a HITRUST Risk-based, 2-year (r2) Validated Assessment and is not intended to replace it. Instead, the HITRUST Bridge Assessment for r2 Certification was designed to offer limited assurance while the Organization completes a HITRUST Risk-based, 2-year (r2) Validated Assessment.

HITRUST