HITRUST
6175 Main Street
Suite 400
Frisco, TX 75034

Letter of HITRUST Risk-based, 2-year (r2) Certification

August 20, 2024

Chinstrap Penguin Corporation
123 Main Street
Anytown, TX 12345

HITRUST has developed the HITRUST CSF, a certifiable security and privacy framework which incorporates information protection requirements based on input from leading organizations. HITRUST identified a subset of the HITRUST CSF requirements that an organization must meet to be HITRUST Risk-based, 2-year (r2) Certified for a defined assessment scope. Chinstrap Penguin, Inc. ("the Organization") has chosen to perform a HITRUST CSF v11.4 r2 validated assessment utilizing a HITRUST Authorized External Assessor Organization ("External Assessor").

Scope

The following platforms of the Organization were included within the scope of this assessment ("Scope") which included a review of the referenced facilities and supporting infrastructure for the applicable information protection requirements:

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

Certification

The Organization has met the criteria specified as part of the HITRUST Assurance Program to obtain a HITRUST r2 validated assessment report with certification ("Certification") for the Scope. Certification is awarded based on each domain's average maturity score meeting a minimum score. Within each domain the maturity scores for each requirement statement were

validated by an External Assessor and the assessment was subjected to quality assurance procedures performed by HITRUST.

The Certification for the Scope is valid for a period of two years from the date of this letter assuming the following occurs. If any of these criteria are not met, HITRUST will perform an investigation to determine ongoing validity of the certification and reserves the right to revoke the Organization's certification.

- No security events 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

- No significant changes in the business or security policies, practices, controls, and processes have occurred that might impact its ability to meet the HITRUST r2 certification criteria specified as part of the HITRUST Assurance Program.

Users of this letter can contact HITRUST customer support (*support@hitrustalliance.net)* for questions on using this letter.

The Organization's Assertions

Management of the Organization has provided the following assertions to HITRUST:

- The Organization has acknowledged that, as members of management, they are responsible for the information protection controls implemented as required by the HITRUST.

- The Organization has implemented the information protection controls as described within their assessment.

- The Organization maintains the information security management program via monitoring, review, and periodic re-assessments of the information protection controls.

- The Organization has responded honestly, accurately, and completely to inquiries made throughout the assessment process and certification lifecycle.

- The Organization has provided the External Assessor with accurate and complete records and necessary documentation related to the information protection controls included within the scope of its assessment.

- The Organization has disclosed all design and operating deficiencies in its information protection controls of which is it aware throughout the assessment process, including those where it believes the cost of corrective action may exceed the benefits.

- No events or transactions have occurred or are pending that would have an effect on the assessment that was performed and used as a basis by HITRUST for issuing the report.

- There have been no communications from regulatory agencies concerning noncompliance with or deficiencies regarding the information protection controls that are included within the Scope of this assessment.

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 HITRUST r2 validated assessments 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 all 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.

A version of this letter with a more detailed scope description has also been issued by HITRUST which can also be requested from the organization listed above directly. A full HITRUST Validated Assessment Report has also been issued by HITRUST which can also be requested from the organization listed above directly. Additional information on the HITRUST Assurance Program can be found at the HITRUST website (*https://hitrustalliance.net).*

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Limitations of Assurance

The HITRUST Assurance Program is intended to gather and report information in an efficient and effective manner. The assessment is not a substitute for a comprehensive risk management program but is a critical data point in risk analysis. The assessment should also not be a substitute for management oversight and decision-making but, again, leveraged as a key input.

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