

## Security and Privacy Policy

### 1. Information Security and Privacy Objectives

- 1.1 To protect sensitive information and safeguard all sensitive data, including client information, proprietary software, and intellectual property.
- 1.2 To maintain compliance with laws and regulations, adhering to relevant data protection, privacy, and security laws and regulations applicable to our industry and client contracts.

### 2. Access Control

#### 2.1 User Authentication:

- Use strong authentication mechanisms for system access, including at least two-factor authentication to access client systems.

#### 2.2 User Authorization:

- Ensure access is granted on a need-to-know basis and follows the principle of least privilege.

### 3. Data Protection and Privacy

#### 3.1 Data Encryption:

- Make use of virtual private networks (VPN) to create a secure connection between computing devices and client computer networks to protect sensitive client data.

#### 3.2 Data Handling:

- Establish procedures for secure storage, transfer, and disposal of data in compliance with relevant data protection laws.

#### 3.3 Children's Privacy:

- Softer Ingenuity does not knowingly collect personal information from children under the age of 13. If you believe that we have unintentionally collected personal information from a child under 13, please contact us immediately so that we can take appropriate steps to remove such information from our records.

### 4. Security Awareness and Training

#### 4.1 Employee Training:

- Conduct regular security awareness training for all staff to promote a culture of security.

#### 4.2 Incident Reporting:

- Report security incidents or potential vulnerabilities promptly.

## **5. Physical Security**

### 5.1 Secure Work Environment:

- Ensure the physical security of workspaces and equipment to prevent unauthorized access.

## **6. Vendor Management**

### 6.1 Third-Party Assessments:

Assess the security practices of third-party vendors and contractors who have access to our systems or data.

## **7. Security Updates and Patch Management**

### 7.1 Regular Updates:

- Keep all software, operating systems, and applications up-to-date with security patches.

## **8. Business Continuity and Disaster Recovery**

### 8.1 Business Continuity Plan:

- Develop and maintain a plan to ensure the continuity of critical business operations in the event of disruptions.

### 8.2 Data Backup:

- Regularly back up critical data to ensure recoverability in case of data loss or system failure.

## **9. Compliance and Audit**

### 9.1 Access Logs:

- Log access to client networks via VPNs; maintain logs for at least six months.

## **10. Incident Reporting and Accountability**

- Employees or Contractors of Softer Ingenuity must immediately report all suspected breaches of systems or data to the Chief Information Security Officer (CISO) at (518) 227-0880.