## Summary

This document contains specific information about security safeguards and security breech protocols of OmniLife, Inc (OMNILIFE). All commercial products developed, produced, and distributed by OMNILIFE abide by the protocol in this document. Products will transfer and store the following sensitive information; Protected Health Information (PHI), Personally Identifiable Information (PII), company, and employee confidential information.

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**About**: Eric Pahl is a PhD candidate in Health Informatics and serves on the board of directors for Health Information Management Systems Society (HIMSS) Iowa Chapter.

**Platforms**: Google Chrome, Mozilla Firefox, Microsoft Internet Explorer, Apple Safari, Apple iOS, and Google Android.

**Security Partners**: AWS and APTIBLE with passthrough ISO 27001 and HITRUST certifications for our configurations.

**Products**: TXP Chat App v2 (mobile), TXP Chat Web (web), TXP Chat Admin (web), and TXP Platform (API).

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## I. HIPAA

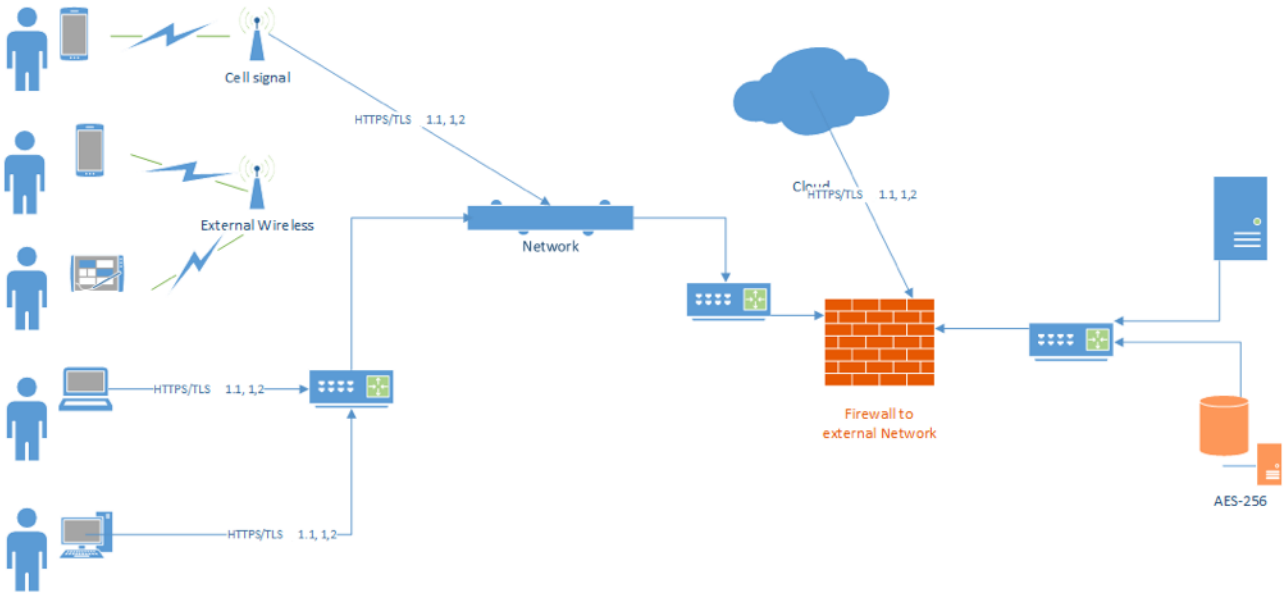
All interactions on any Products are recorded in the HIPAA Activity Audit Log - a log that captures access date/time, user account identifier, records accessed and privileged commands. Logs are retained for at least seven years. Local security administrators can generate reports from logs containing at least; user account identifier, user name, user security level, and user's last login date. The integrity of the audit trail is maintained for disabled or deactivated users and Products will record date/time when accounts have been compromised, disabled or deactivated.

## II. HITECH

Products transfer and store electronic PHI through integrations with Electronic Health Record systems and by direct input from users as text, videos, or photos. Products are not considered EHR systems by HITECH.

## III. Data Security

All data transferred and stored by Products reside within the United States. Data is encrypted in transit (HTTPS TLS 1.1 and 1.2) and in storage (AES 256) meeting NIST Special Publications 800-52 Rev1 and 800-111 standards. Data destruction/sanitation and storage reclamation processes are designed to prevent customer data form being exposed to unauthorized individuals. These processes follow techniques detailed in DoD 5220.22-M and NIST 800-88r1. All decommissioned magnetic storage devices are degaussed and physically destroyed in accordance with industry-standard practices. Each customer's data will be segregated from other customers through logical controls. Encrypted and signed claims based authorization tokens are used to prevent tampering and only allow access to data the user is permitted to see. Backend access is only by SSH and includes role-based controls to manage and audit admin/backend users.



OMNILIFE data centers are hosted by Amazon Web Services (AWS); Tier 3+, SSAE16 certified with SOC 1, 2, and 3 completed regularly. Each component within AWS data centers is tested and maintained regularly every 90 days. AWS provides several reports from third-party auditors who have verified compliance with a variety of computer security standards and regulations (aws.amazon.com/compliance). Physical access is strictly controlled both at the perimeter and at building ingress points by professional security staff utilizing video surveillance, intrusion detection systems, and other electronic means. Authorized staff must pass two-factor authentication a minimum of two times to access data center floors. All visitors and contractors are required to present identification and are signed in and continually escorted by authorized staff. When an employee no longer has a business need for these privileges, his or her access is immediately revoked, even if they continue to be an employee. All physical accesses to data centers by employees are logged and audited routinely. Data center access lists are audited regularly, every 90 days by AWS.

Redundancy is built into the OMNILIFE databases and products offering customizable data archiving and retention. Customer data will be retained, available from export at the termination of the contract, and then sanitized from OMNILIFE exceeding guidelines from NIST SP 800-88 rev1. Disaster Recovery Plans (DRP) are on file for all OMNILIFE systems. DRPs are updated, reviewed and exercised on a regular basis, every 6 months, anytime a major change is made to BAA, and in response to any major hardware or software failure or destruction of facilities. Customer data will never be shared with third parties without permission from customer.

## IV. Customer Contact and Authorization Policy

The purchasing organization will appoint an administrative user (Admin) and register the Admin with OMNILIFE. The Admin will be authorized to create, modify, and delete user accounts. The Admin will be registered using first name, last name, title, email, phone number, mailing address, and a time-sensitive security code via SMS or email. An additional Admin with be authorized as a back-up. Communications with OMNILIFE must originate from the Admin's verified email or phone number and a verbal call-in password or google authenticator will be used for personal verification. All authorized and unauthorized attempts and requests will be reported to Admin via Admin's verified email. If the Admin's email or phone number was compromised, the uncompromised method will be used to update the Admin account information. If the Admin has been compromised entirely, an on-site visit at customer location with OMNILIFE staff is needed to authorize another Admin. OMNILIFE will fulfil requests in a timely manner dependent on incident priority (severity and impact).

| | Severity | Impact | Response | Resolution |
|---|---|---|---|---|
| 3 - Low | Issue prevents the user from performing a portion of their duties. | One or two users affected but still able to complete tasks. | 90% - 24 hours | 90% - 7 days |
| 2 - Medium | Issue prevents the user from performing critical time sensitive functions. | Multiple users affected and multiple functions disabled. | 90% - 4 hours | 90% - 12 hours |
| 1 - High | Service or major portion of a service is unavailable. | All users affected with public facing disability. | 95% - 30 minutes | 90% - 4 hours |

## V. Account Security

In order to access Products, unique login and password are required. Account and password criteria, expiration, auto-logoff, and other administrative policies/procedures are configurable by customers. Products support multiple levels of account access configurable by customers. Products are designed to be accessible and full-

featured, OMNILIFE does not allow for multiple levels of access based on location unless customers ask specifically.

## VI. User Training

All OMNILIFE Products can be accessed in a training sandbox without any PHI or security risk. Training is coordinated with OMNILIFE representatives and any Product updates will be accompanied by an opportunity for virtual and/or in-person training from a certified OMNILIFE support technician.

## VII. Mobile Access

OMNILIFE Products are accessible via any of our certified Platforms. For native mobile application Products, a user is registered using a phone number and email. The phone number is verified by a pin number containing six pseudo-random numbers expiring in five minutes and delivered via SMS text message. Both the user and customer administrator are notified of successful registration. Password recovery is completed through an expiring (five minutes) secure email link, and within the native mobile application, by using a temporary pin number delivered via SMS, expiring in five minutes. Data is not stored locally or in cache on any Products, data is merely accessed by Products and displayed for the users. Data is transferred to/from the phone using HTTPS TLS v1.1 and v1.2. Native mobile applications allow for photo and video capture and file upload.