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Awareness Training Service TOMs

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This document describes technical and organizational security measures and controls implemented by Mimecast to protect the data customers entrust to us as part of the Mimecast Awareness Training services on MIME | OS (Mimecast AT1 MIME | OS Service). Within this document, the following definitions apply:

- "Customer" means any subscriber to the Mimecast AT1 MIME OS Service.
- "Mimecast AT1 MIME | OS Service" means the Software-as-a-Service provided by Mimecast to our Customers hosted on the MIME | OS grid.
- "Customer Data" means any information provided or submitted by the Customer that is processed by the Mimecast AT1 MIME | OS Service.
- "Personal Data" means any information relating to an identified or identifiable natural person.
- "Personnel" means Mimecast employees and authorized individual contractors/vendors.

1. Organization of Information Security

Objective:

To outline Mimecast's information security structure.

- a. Mimecast employs full-time dedicated trained/certified security Personnel responsible for information security.
- b. The information security function reports directly to the Mimecast senior leadership team.
- c. Mimecast has a comprehensive set of information security policies, approved by senior management, and disseminated to all Personnel.

- d. All Mimecast Personnel have signed legally reviewed confidentiality agreements.
- e. All Mimecast Personnel are given training in information security.

2. Information Security Management System

Objective:

To demonstrate Mimecast's commitment to manage the assessment and treatment of these risks and to continually improve its information security.

Measures:

Mimecast has deployed an ISMS (Information Security Management System) that serves as the foundation of our information security practices.

3. Physical Access

Objective:

To protect the physical assets that contain Customer Data.

- a. The Mimecast AT1 MIME OS Service operates from several industry certified third-party production data centers with a defined and protected physical perimeter, strong physical controls including access control mechanisms, controlled delivery and loading areas, surveillance, and security guards.
- b. Each Data Center is audited for compliance to Mimecast security controls.
- c. Only authorized Personnel have access to the data center premises housing Customer Data and access is controlled through a security registration process requiring a government issued photo ID.
- d. Power and telecommunications cabling carrying Customer Data or supporting information services at the production data centers are protected from interception, interference, and damage.
- e. The production data centers, and their equipment are physically protected against natural disasters, unauthorized entry, malicious attacks, and accidents.

f. Equipment at the production data center is protected from power failures and other disruptions caused by failures in supporting utilities and is appropriately maintained.

4. System Access

Objective:

To ensure systems containing Customer Data are used only by approved, authenticated users.

Measures:

- a. Access to Mimecast systems is granted only to Mimecast Personnel and/or to permitted employees of Mimecast's subcontractors and access is strictly limited as required for those persons to fulfil their function.
- b. All users access Mimecast systems with a unique identifier (UID).
- c. Mimecast has established a password policy that prohibits the sharing of passwords and requires passwords to be changed on a regular basis and default passwords to be altered. All passwords must fulfil defined minimum complexity requirements and are stored in encrypted form.
- d. Mimecast has a comprehensive process to deactivate users and their access when Personnel leaves the company or a function.
- e. All access or attempted access to systems is logged and monitored.

5. Data Access

Objective:

To ensure Personnel entitled to use systems gain access only to the Customer Data that they are authorized to access.

- a. As a matter of course, Mimecast Personnel do *not* access Customer Data.
- b. Mimecast restricts Personnel access to Customer Data on a "need-to-know" basis based on this justification.
- c. Each such access and its subsequent operations are logged and monitored.
- d. Personnel training covers access rights to and general guidelines on definition and use of Customer Data.

6. Data Transmission/Storage/Destruction

Objective:

To ensure Customer Data is not read, copied, altered or deleted by unauthorized parties during transfer/storage.

Measures:

- a. Customer access to the Mimecast AT1 MIME OS Service portals are protected by the most current version of Transport Layer Security (TLS).
- b. Upon Customer's request, Customer Data will be promptly deleted.
 - i. It should be noted that with each deletion request, the Customer Data is logically deleted in the first storage copy and then completely deleted across the other copies. This is done in order to prevent accidental deletions or possible intentional damage.

7. Confidentiality and Integrity

Objective:

To ensure Customer Data remains confidential throughout processing and remains intact, complete and current during processing activities.

- a. Mimecast has a formal background check process and carries out background checks on all new Personnel.
- b. Mimecast trains its engineering Personnel in application security practices and secure coding practices.
- c. Mimecast has a central, secured repository of product source code, which is accessible only to authorized Personnel.
- d. Mimecast has a formal application security program and employs a robust Secure Development Lifecycle (SDLC).
- e. Security testing includes code review, penetration testing, and employing static code analysis tools on a periodic basis to identify flaws.
- f. All changes to software on the Mimecast AT1 MIME | OS are via a controlled, approved release mechanism within a formal change control program.

8. Availability

Objective:

To ensure Customer Data is protected from accidental destruction or loss, and there is timely access, restoration or availability to Customer Data in the event of a Mimecast AT1 MIME OS incident.

- a. Mimecast uses a high level of redundancy when storing Customer Data. Customer Data is stored in triplicate across 2 geographically separate data centers using 2 separate cross connections.
- b. Each data center can be failed over/back in the event of flooding, earthquake, fire or other physical destruction or power outage to protect Customer Data against accidental destruction and loss.
- c. Each production data center has multiple power supplies, generators on-site and with battery back-up to safeguard power availability to the data center.
- d. Each production data center has multiple access points to the Internet to safeguard connectivity.
- e. Each production data center is monitored 24x7x365 for power, network, environmental and technical issues.
- f. Mimecast maintains a robust Business Continuity/Disaster Recovery program including.
- g. Incident response plans are reviewed updated and tested.
- h. Mimecast receives an annual independent ISO 22301 assessment of its Business Continuity practices.
- i. Customers can request copies of this assessment on an annual basis through their Customer Experience contact.

9. Data Separation

Objective:

To ensure each Customer's Data is processed separately.

Measures:

a. Mimecast uses logical separation within its multi-tenant architecture to enforce data segregation between customers.

b. In each step of the processing, Customer Data received from different Customers is assigned a unique identifier, so data is always physically or logically separated.

10.Incident Management

Objective:

In the event of any security breach of Customer Data, the effect of the breach is minimized, and the Customer is promptly informed.

Measures:

- a. Mimecast maintains an up-to-date incident response plan that includes responsibilities, how information security events are assessed and classified as incidents and response plans and procedures.
- b. Mimecast regularly tests its incident response plans and lessons learned are used to improve the plans. In the event of a security breach, Mimecast will notify Customers without undue delay after becoming aware of the security breach.

11. Audit

Objective:

To ensure Mimecast regularly tests, assesses, and evaluates the effectiveness of the technical and organizational measures outlined above.

- a. Mimecast conducts regular audits of its security practices.
- b. Mimecast ensures that Personnel are aware of and comply with the technical and organizational measures set forth in this document.