



## SmartPay Information Security Program

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### Introduction

At SmartPay, we understand how important your sensitive data is and protecting it is our top priority. We are committed to safeguarding your information with the highest standards of security. If you have any questions or concerns about how we handle your data, please do not hesitate to contact us. We are here to help and provide you with the peace of mind you deserve.

### Data Encryption

All your sensitive data is encrypted both when it is stored in our databases and when it is transmitted over the internet. This means that your information is converted into a code that only authorized systems and personnel can understand.

### Access Control

We have strict access controls in place to ensure that only authorized employees can access your data. Each employee has a unique login, and their access is limited to only the information they need to perform their job. Additionally, we regularly monitor and audit access to detect any unauthorized attempts to access sensitive information.

### Security Audits

Our systems undergo regular security reviews, audits and updates to identify and address any potential vulnerabilities. We work with external security experts to ensure that our defenses are up-to-date, robust and effective against emerging threats.

## **Employee Training**

All our employees receive initial and recurring annual training on data protection best practices and our security policies. This helps ensure that everyone in our organization understands how to handle your data safely and securely in day-to-day operations.

## **Regulation & Standards**

We comply with all relevant data protection regulations, including [e.g., GLBA, CCPA], to ensure your data is handled in accordance with the highest legal standards. SmartPay is SOC 2 compliant, which stands for System and Organization Controls 2. It was created by the American Institute of Certified Public Accountants (AICPA) as a way to help organizations verify their security and reduce the risk of a security breach.

## **Incident Response**

In the unlikely event of a data breach, we have a comprehensive incident response plan. This plan includes immediate steps to contain the breach, assess the impact, notify affected customers, and take corrective actions to prevent future incidents.

## **Disaster Recovery**

In the very unlikely event of an unexpected regional cloud service outage, we have a tested disaster recovery plan in place to restore production services in an alternate region.

## **Adequate Insurance Protection**

SmartPay takes its responsibility for having proper security measures in place very seriously. In addition, SmartPay also takes responsibility for having adequate Cyber Security coverage in place as well. We would be more than happy to provide proof of our coverage when appropriate.