

Sarbarnes-Oxley Act

The Sarbarnes-Oxley Act (SOX) of 2002 was created to protect investors from accounting practices and financial reports. The SOX consists of stringent rules regarding the accuracy and reliability of specific accounting information. SOX places the responsibility for compliance with these rules on the companies and registered accounting firms. The provisions of the Act were enacted to strengthen the maintenance requirements of records and the auditing and reporting standards surrounding the records. The Act specifies what information must be maintained, how long it must be maintained, accounting procedure requirements and the criminal and civil consequences for failure to comply.

In attempting to comply with these new requirements that place more rigorous requirements on financial reporting, the storing of records becomes vitally important. Although there is no specific language about how the information must be stored, one of the best storage mechanisms is electronic storage. Regulated companies are choosing to outsource to remote data storage service providers.

Semper Vivo is an excellent choice to ensure storage and accessibility of the information in compliance with SOX regulations. Semper Vivo will ensure the data that you store with us is available and secure. Our safe guards provide for data security, accountability, monitoring, accessibility, ensure authorized access only, and retention. Using our services provide you with the means to comply with the SOX requirements. We are not privy to the content that you store, so we are not responsible for ensuring you are in compliance with what you store. We are simply a compliant repository for your data along with providing you with the services to make your storage compliant. it is your responsibility that you store your information in compliance with SOX and to provide access only to authorized personnel.

| Sarbarnes-Oxley Act Requirement | Semper Vivo Service |
|--|---|
| Secure - Information cannot be tampered with or altered by any one | Data is encrypted using a 128-bit encryption. Semper Vivo does not have access to the password. Semper Vivo employees do not have access to the data. |
| Accountability - Trail of transactions must be discernable and kept in sequence | We do not overwrite documents. They are serialized. |
| Monitoring - Audit trails | Logs are kept reflecting the date, time and person each time a document is accessed. |
| Authorized Access - Information is available only to client's authorized personnel | Only authorized personnel with the password have access to the data. |
| Accessibility - Records must be accessible. | We ensure accessibility through data backups. All backups are immediately available 24/7. |
| Retention - Certain data must be maintained for not less than 7 years. | Data will remain securely stored at Semper Vivo as long as the client chooses to maintain Semper Vivo services. Document retention is set during initial configuration. Upon expiration of the preset retention period, the data is disposed automatically by the system. |