

At Sterling Ideas, we understand that complying with the Federal Trade Commission’s newly revised Safeguards Rule can be a daunting endeavor for organizations. That’s why we’ve created a compliance process that takes a commonsense, step-by-step approach. Unlike most companies offering compliance packages, we are uniquely staffed with both compliance professionals *and IT professionals* who collaborate as a team and work with you every step of the way to educate and advise.

We are not interested in providing a false sense of security; we’re interested in an honest evaluation of your organization’s risks, the protection of customer information, and the overall strengthening of your organization’s security stance. Yes, we provide starter documents for the written components that the FTC requires. But more than that, we help your organization establish a robust Year 1 compliance benchmark from which subsequent years can be measured. Over time, the evidence collected will tell not only the story of your organization’s compliance journey but also its compliance *maturity*.

<p align="center"><b>Year 1 Full Compliance Package</b> to meet the Federal Trade Commission’s newly revised Safeguards Rule</p>	<p align="center"><b>Full Compliance Package</b></p>
<p>Number of remote meetings conducted with members of the Sterling Ideas Compliance Team and IT Professionals, approx. 30 mins - 1 hour each</p>	<p align="center">12-15</p>
<p>Access to consult with Sterling Ideas Compliance Team and IT Professionals in support of the compliance initiative</p>	<p align="center">✓</p>
<p>Collaborative Compliance Journal</p>	<p align="center">✓</p>
<p>9 Sterling Ideas Compliance Guides for helpful pacing through the compliance process and ease of reference</p>	<p align="center">✓</p>
<p>Data Set Identification</p>	<p align="center">✓</p>
<p>Compliance Program Maturity Questionnaire (currently 121 questions)</p>	<p align="center">✓</p>
<p>Written Risk Assessment addressing 140 risks, hazards, and vulnerabilities; includes automated risk scores and section for plans of action</p>	<p align="center">✓</p>
<p>Written Information Security Program addressing the 8 safeguards</p>	<p align="center">✓</p>
<p>Recommendation for a reputable cybersecurity company to provide annual penetration testing and semi-annual vulnerability assessments</p>	<p align="center">✓</p>
<p>Review and Evaluation of your organization’s current Policies and Procedures; provision of 8 additional policies and procedures written to address the FTC’s 8 safeguards</p>	<p align="center">✓</p>

Quarterly access to Sterling Ideas' recorded Security Awareness Training videos; provision of security awareness training form or system for documentation	✓
Monthly Sterling Ideas Tech Talk newsletter for additional security awareness training	✓
Review and Evaluation of your organization's Service Providers; provision of email template and vendor questionnaire for oversight of third-party service providers	✓
Up to 2 additional Risk Assessments conducted within one year to address any new risks, revelations, or changes in your organization or environment that warrant further protecting of customer information (i.e., testing reveals security issues, your organization is opening a new campus, a new vendor is being considered, your Qualified Individual is changing, etc.)	✓
Written Incident Response Plan	✓
Written Report to your organization's board of directors, equivalent governing body, or senior officer responsible for the Information Security Program	✓
Quarterly 1-hour reviews of your organization's compliance stance; provision of documentation to add to your compliance evidence	✓
Electronic bundling of all compliance documentation	✓
Printed binders of compliance evidence for up to 5 stakeholders	✓
One 1-hour meeting to review your organization's cybersecurity insurance application, policy, or needs	✓
Standard Price	\$18,000
AACS Member Discounted Price	\$12,000

*We offer AACS members the option of paying \$5000 at the beginning of the process and \$585 per month for the first year. This would require putting a credit card on file.*

After Year 1, we help you maintain compliance by conducting a comprehensive review of the entire process.

- The **Compliance Journal** will continue to create the running narrative of your organization's actions towards compliance.
- A fresh look at **Data Set Identification** will help ensure proper protections over the customer information the FTC strives to guard.
- Additions to the **Compliance Program Maturity Questionnaire** will provide further evidence of your organization's compliance development.
- A current **Risk Assessment** will reveal any new risks targeting your data and allow for new plans of action to address them.
- Any updates to your **Information Security Program** will better support the 8 safeguards.
- The scheduling of the **Annual Penetration Test and Semi-annual Vulnerability Scans** will fulfill the FTC's requirements for monitoring of your organization's systems.
- A quick review of your **Policies and Procedures** will make sure your organization's day-to-day

operations truly align with company guidelines.

- A year's worth of access to up-to-date **Cybersecurity Awareness Training** will keep your staff sharp and security top-of-mind, and a year's worth of Tech Talk newsletters will provide content for further training.
- An annual **Evaluation of your Service Providers** will help make sure they are protecting customer information and upholding the safeguards.
- Any updates to your **Incident Response Plan** will serve to keep your plan current and usable.
- A final **Report** will communicate effectively to stakeholders and consolidate the evidence for the year's compliance process.
- Throughout the year, you will continue to have access to consult with Sterling Ideas Compliance Team and IT Professionals in support of the compliance initiative.

Full Compliance in Year 2 has a standard price of \$10,000. The AACCS Member Discounted Price is \$7,000.