



A-LIGN



Corporate Colocation, Inc.
Type 2 SOC 1
2018



**REPORT ON MANAGEMENT'S DESCRIPTION OF CORPORATE COLOCATION,
INC.'S SYSTEM AND THE SUITABILITY OF THE DESIGN AND OPERATING
EFFECTIVENESS OF CONTROLS**

**Pursuant to Statement on Standards for Attestation Engagements No. 18
(SSAE 18) Type 2**

March 16, 2017 through March 15, 2018

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SECTION 1
INDEPENDENT SERVICE AUDITOR'S REPORT

**INDEPENDENT SERVICE AUDITOR'S REPORT ON A DESCRIPTION OF CORPORATE
COLOCATION, INC.'S SYSTEM AND THE SUITABILITY OF THE DESIGN
AND OPERATING EFFECTIVENESS OF CONTROLS**

To Corporate Colocation, Inc.:

We have examined Corporate Colocation, Inc.'s ('Corporate Colocation' or 'the Company') description of its information technology general control system for the Colocation Services at its Los Angeles, California location for the period March 16, 2017 through March 15, 2018, and the suitability of the design and operating effectiveness of controls to achieve the related control objectives stated in the description, based on the criteria identified in the "Corporate Colocation, Inc. Assertion" (assertion). The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls contemplated in the design of Corporate Colocation's controls are suitably designed and operating effectively, along with related controls at the service organization. Our examination did not extend to such complementary user entity controls, and we have not evaluated the suitability of the design and operating effectiveness of such complementary user entity controls.

In Section 2 of this report, Corporate Colocation has provided an assertion about the fairness of the presentation of the description and suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description. Corporate Colocation is responsible for preparing the description and for the assertion, including the completeness, accuracy, and method of presentation of the description and the assertion, providing the services covered by the description, specifying the control objectives and stating them in the description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria, and designing, implementing, and documenting controls to achieve the related control objectives stated in the description.

Our responsibility is to express an opinion on the fairness of the presentation of the description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on our examination. We conducted our examination in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether, in all material respects, the description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the description for the period March 16, 2017 through March 15, 2018.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of the service organization's controls to achieve the related control objectives stated in the description involves performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of those controls to achieve the related control objectives stated in the description.

Our procedures included assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the description. Our procedures also included testing the operating effectiveness of those controls that we consider necessary to provide reasonable assurance that the related control objectives stated in the description were achieved. An examination engagement of this type also includes evaluating the overall presentation of the description and the suitability of the control objectives stated therein, and the suitability of the criteria specified by the service organization and described in Section 2. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Because of their nature, controls at a service organization may not prevent, or detect and correct, all errors or omissions in its information technology general control system. Also, the projection to the future of any evaluation of the fairness of the presentation of the description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become inadequate or fail.

In our opinion, in all material respects, based on the criteria described in Corporate Colocation's assertion in Section 2 of this report:

- the description fairly presents the information technology general control system that was designed and implemented for the Colocation Services for the period March 16, 2017 through March 15, 2018.
- the controls related to the control objectives stated in the description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively for the period March 16, 2017 through March 15, 2018 and user entities applied the complementary controls contemplated in the design of Corporate Colocation's controls for the period March 16, 2017 through March 15, 2018.
- the controls tested, which together with the complementary user entity controls referred to in the scope paragraph of this report, if operating effectively, were those necessary to provide reasonable assurance that the control objectives stated in the description were achieved, operated effectively for the period March 16, 2017 through March 15, 2018.

The specific controls tested and the nature, timing, and results of those tests are listed in Section 4.

This report, including the description of tests of controls and results thereof in Section 4, is intended solely for the information and use of Corporate Colocation, user entities of Corporate Colocation's information technology general control system during some or all of the period March 16, 2017 through March 15, 2018, and the independent auditors of such user entities, who have a sufficient understanding to consider it, along with other information including information about controls implemented by user entities themselves, when assessing the risks of material misstatements of user entities' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.

A handwritten signature in black ink that reads "A-LIGN". The letter "A" is significantly larger and more stylized than the other letters.

June 1, 2018
Tampa, Florida

SECTION 2
CORPORATE COLOCATION, INC.'S ASSERTION



Corporate Colocation, Inc.'s Assertion

June 1, 2018

We have prepared the description of Corporate Colocation, Inc.'s information technology general control system for the Colocation Services during some or all of the period March 16, 2017 through March 15, 2018 (description) for user entities of the system during some or all of the period March 16, 2017 through March 15, 2018, and their user auditors who have a sufficient understanding to consider it, along with other information, including information about controls implemented by user entities of the system themselves, when assessing the risks of material misstatements of user entities' financial statements.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Corporate Colocation controls are suitably designed and operating effectively, along with related controls at the service organization. The description does not extend to controls of the user entities.

We confirm, to the best of our knowledge and belief, that:

- a. The description fairly presents the information technology general control system made available to user entities of the system during some or all of the period March 16, 2017 through March 15, 2018 for processing their transactions. The criteria we used in making this assertion were that the description:
 - i. presents how the system made available to user entities of the system was designed and implemented, including:
 - (1) The types of services provided.
 - (2) The procedures, within both automated and manual systems, by which services are initiated, authorized, recorded, processed, corrected as necessary, and transferred to reports and other information prepared for user entities.
 - (3) How the system captures significant events and conditions, other than transactions.
 - (4) The process used to prepare reports and other information for user entities.
 - (5) The specified control objectives and controls designed to achieve those objectives, including as applicable, complementary user entity controls contemplated in the design of the service organization's controls.
 - (6) Other aspects of our control environment, risk assessment process, information and communication systems (including related business processes), control activities, and monitoring controls that are relevant to processing and reporting transactions of user entities of the system.
 - ii. does not omit or distort information relevant to the scope of the information technology general control system, while acknowledging that the description is prepared to meet the common needs of broad range of user entities of the system and the independent auditors of those user entities, and may not, therefore, include every aspect of the Colocation Services information technology general control system that each individual user entity of the system and its auditor may consider important in its own particular environment.
- b. The description includes relevant details of changes to the service organization's system during the period covered by the description when the description covers a period of time.

- c. The controls related to the control objectives stated in the description were suitably designed and operated effectively for the period March 16, 2017 through March 15, 2018 to achieve those control objectives if user entities applied the complementary controls assumed in the design of Corporate Colocation's controls throughout the period March 16, 2017 through March 15, 2018. The criteria we used in making this assertion were that:
- i. the risks that threaten the achievement of the control objectives stated in the description have been identified by the service organization;
 - ii. the controls identified in the description would, if operating as described, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved; and
 - iii. the controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority.

victor goodman

Victor Goodman
Chief Executive Officer
Corporate Colocation, Inc.

SECTION 3
DESCRIPTION OF THE SYSTEM PROVIDED
BY THE SERVICE ORGANIZATION

OVERVIEW OF OPERATIONS

Company Background

Corporate Colocation, Inc. (Corporate Colocation) located in Los Angeles, California was established in 2000. A California Privately Held Corporation, Corporate Colocation is a pioneer in data center operations and network management. Corporate Colocation purchased Mzima Colocation in 2004 and has had a constant trajectory of growth since that time.

Description of Services Provided

Colocation

Electrical Specs:

Cabinet Power Capacity:

- Up to 10kW available per cabinet

UPS:

- 2 Power Buses (A + B)
- 2 X ACTIVE UPS (200kVA ea.) banks for each bus

Diesel Generators:

- 2 x 2.0 Megawatt ACTIVE diesel generators
- 1 x 2.0 Megawatt PASSIVE diesel generators
- Total of 6.0 Megawatts
- Each generator has 4000 gallons directly attached
- Each generator has a dedicated fuel polisher to maintain clean fuel
- Agreement with primary fuel vendor for 48 hour turn-around on supplying additional fuel
- Agreement with secondary fuel vendor for 4 hour turn-around on supplying additional fuel
- Vendor = Caterpillar

Power Grid:

- 4.0 Megawatt feed from LADWP Grid A
- Backup 4.0 Megawatt feed from LADWP Grid B

Connectivity/ Providers/ Bandwidth:

- ATT/ Level3/ HE/ Packet Exchange locally available
- Access to ALL PROVIDERS via dark fiber to One Wilshire MMR
- From 10 Mbps - 10Gbps available bandwidth options

Physical:

- Total square footage = 30,000 sq. ft.
- Colocation area = 15,000 sq. ft.
- Satellite Platform on roof for mounting dish/ antennae
- Rack Types are:
 - 4 - post = Chatsworth
 - 19" between rails (external dimensions = 85" H X 24" W X 42" D)
- Total square footage = 30,000 sq. ft.
- Colocation area = 15,000 sq. ft.
- Satellite Platform on roof for mounting dish/ antennae
- Rack Types are:
 - 4- post = Chatsworth
 - 19" between rails (external dimensions = 85" H X 24" W X 42" D)
 - 2-post= Chatsworth

Cooling:

- 3 X 400 Ton ACTIVE Chillers
- 1 X 200 Ton PASSIVE Chiller

Environmental:

- Floor is reinforced concrete slab
- Standard square hole rails in all cabinets
- Standard media: Fiber with SC or LC connectors; CAT6, COAX
- Installation readiness: 1-2 weeks for cage build out. Power and Cross-connects can be delivered inside 48 hours
- Pre-Action Dry-Pipe VESDA fire suppression system

Security:

- 24x7 On-site Security Guards present for gaining access
- 24x7 On-Site technical support
- Biometric Access Scanners:
 - Access to the Data Center floor requires both a key card as well as a matching biometric finger scan
 - Dedicated cages come standard with an additional door with access keys
 - Additional biometric finger scanners for dedicated cages are available
- CCTV captures all areas of the data center facility
- Both the shared floor space as well as all the private cages are equipped with CCTV which digitally records all activity
- Cabinets are available either "open" or "closed":
 - Closed cabinets are outfitted with standard keyed locks

Transactions Processing & Reporting

Not applicable as Corporate Colocation does not participate in any transaction processing or reporting with the colocation services.

Significant Events

Corporate Colocation has implemented automated and manual procedures to capture and address significant event and conditions. In addition, detailed monitoring and risk assessment procedures are in place to provide management with detailed information that impacts the Colocation services system. Please see the procedures, monitoring, and risk assessment procedures described in the relevant sections of this report for further details.

Functional Areas of Operation

The Corporate Colocation staff provides support for the above services in each of the following functional areas:

- Executive management - provides general oversight and strategic planning of operations
- Customer Support - serves customers by providing product and service information that includes resolving product and service issues

Transactions Processing & Reporting

Not applicable - No transaction processing or reporting is involved in the colocation services provided by Corporate Colocation.

Significant Events

Corporate Colocation has implemented automated and manual procedures to capture and address significant event and conditions. In addition, detailed monitoring and risk assessment procedures are in place to provide management with detailed information that impacts the Colocation services system. Please see the procedures, monitoring, and risk assessment procedures described in the relevant sections of this report for further details.

Functional Areas of Operation

The Corporate Colocation staff provides support for the above services in each of the following functional areas:

- Executive management - provides general oversight and strategic planning of operations
- Customer Support - serves customers by providing product and service information that includes resolving product and service issues

Boundaries of the System

The scope of this report includes the Colocation services system performed in the Los Angeles, California facilities.

Subservice Organizations

No subservice organizations were included in the scope of this assessment.

Significant Changes Since the Last Review Period

No significant changes have occurred to the services provided to user entities since the organization last review.

CONTROL ENVIRONMENT

Integrity and Ethical Values

The effectiveness of the effectiveness of controls cannot rise above the integrity and ethical values of the people who create, administer, and monitor them. Integrity and ethical values are essential elements of Corporate Colocation, Inc.'s control environment, affecting the design, administration, and monitoring of other components.

Integrity and ethical behavior are the product of Corporate Colocation, Inc.'s ethical and behavioral standards, how they are communicated, and how they are reinforced in practices. They include management's actions to remove or reduce incentives and temptations that might prompt personnel to engage in dishonest, illegal, or unethical acts. They also include the communication of entity values and behavioral standards to personnel through policy statements and codes of conduct, as well as by example.

Commitment to Competence

Corporate Colocation, Inc.'s management defines competence as the knowledge and skills necessary to accomplish tasks that define employees' roles and responsibilities. Management's commitment to competence includes management's consideration of the competence levels for jobs and how those levels translate into the requisite skills and knowledge.

Management's Philosophy and Operating Style

Corporate Colocation, Inc.'s management philosophy and operating style encompass a broad range of characteristics. Such characteristics include management's approach to taking and monitoring business risks, and management's attitudes toward information processing, accounting functions and personnel.

Organizational Structure and Assignment of Authority and Responsibility

Corporate Colocation, Inc.'s organizational structure provides the framework within which its activities for achieving entity - wide objectives are planned, executed, controlled, and monitored. Management believes that establishing a relevant organizational structure includes considering key areas of authority and responsibility. An organizational structure has been developed to suit its needs. This organizational structure is based, in part, on its size and the nature of its activities.

Corporate Colocation, Inc.'s assignment of authority and responsibility activities include factors such as how authority and responsibility for operating activities are assigned and how reporting relationships and authorization hierarchies are established.

Human Resources Policies and Practices

Corporate Colocation's success is founded on sound business ethics, reinforced with a high level of efficiency, integrity, and ethical standards. The result of this success is evidenced by its proven track record for hiring and retaining top quality personnel who ensures the service organization is operating at maximum efficiency. Corporate Colocation's human resources policies and practices relate to employee hiring, orientation, training, evaluation, counseling, promotion, compensation, and disciplinary activities.

Specific control activities that the service organization has implemented in this area are described below:

- Hiring procedures are in place and are documented
- Employee termination procedures are in place to guide the termination process and are documented

RISK ASSESSMENT

Corporate Colocation, Inc. has placed into operation a risk assessment process to identify and manage risks that could affect the organization's ability to provide reliable processing for user organizations. This process requires management to identify significant risks in their areas of responsibility and to implement appropriate measures to address those risks.

Risks that are considered during management's risk assessment activities include the following:

- Changes in operating environment
- New personnel
- New or revamped information systems
- Rapid growth
- New technology
- New business models, products, or activities
- Corporate restructurings
- New accounting pronouncements

Management's recognition of risks that could affect the organization's ability to provide reliable processing for its user organizations is generally implicit, rather than explicit. Management's involvement in the daily operations allows them to learn about risks through direct personal involvement with employees and outside parties, thus reducing the need for formalized and structured risk assessment processes.

CONTROL OBJECTIVE AND RELATED CONTROL ACTIVITIES

Corporate Colocation's control objectives and related control activities are included in Section 4 of this report to eliminate the redundancy that would result from listing the items in this section and repeating them in Section 4. Although the control objectives and related control activities are included in Section 4, they are, nevertheless, an integral part of Corporate Colocation's description of controls.

The description of the service auditor's tests of operating effectiveness and the results of those tests are also presented in Section 4, adjacent to the service organization's description of controls. The description of the tests of operating effectiveness and the results of those tests are the responsibility of the service auditor and should be considered information provided by the service auditor.

Integration with Risk Assessment

Along with assessing risks, Corporate Colocation, Inc. has identified and put into effect actions needed to address those risks. To address risks, control activities have been placed into operation to help ensure that the actions are carried out properly and efficiently. Control activities serve as mechanisms for managing the achievement of those objectives.

The description of the service auditor's tests of operating effectiveness and the results of those tests are also presented in Section 4, adjacent to the service organization's description of controls. The description of the tests of operating effectiveness and the results of those tests are the responsibility of the service auditor and should be considered information provided by the service auditor.

Selection and Development of Control Activities Specified by the Service Organization

Control activities are a part of the process by which Corporate Colocation, Inc. strives to achieve its business objectives. Corporate Colocation, Inc. has applied a risk management approach to the organization to select and develop control activities. After relevant risk have been identified and evaluated, controls are established, implemented, monitored, reviewed and improved when necessary to meet the overall objectives of the organization.

Corporate Colocation, Inc.'s control objectives and related control activities are included in Section 4 (the "Testing Matrices") of this report to eliminate the redundancy that would result from listing the items in this section and repeating them in the Testing Matrices. Although the control objectives and related control activities are included in the Testing Matrices, they are, nevertheless, an integral part of Corporate Colocation, Inc.'s description of the data center services system.

The description of the service auditor's tests of operating effectiveness and the results of those tests are also presented in the Testing Matrices, adjacent to the service organization's description of control activities. The description of the tests of operating effectiveness and the results of those tests are the responsibility of the service auditor and should be considered information provided by the service auditor.

MONITORING

Strict peer review protocols and division of responsibilities and weekly management meetings to discuss outstanding items and issues provides for real time monitoring of operational activities. Regular conference calls with vendors and client organizations assist in the monitoring process. Senior management is extremely involved in the day to day operations of the company and provides for hands on monitoring. An independent financial audit and compliance audit take place to allow for monitoring of operations by outside parties.

On-Going Monitoring

Corporate Colocation's management conducts quality assurance monitoring on a regular basis and additional training is provided based upon results of monitoring procedures. Monitoring activities are used to initiate corrective action through department meetings, internal conference calls, and informal notifications.

Management's close involvement in Corporate Colocation's operations helps to identify significant variances from expectations regarding internal controls. Upper management evaluates the facts and circumstances related to any suspected control breakdown. A decision for addressing any control's weakness is made based on whether the incident was isolated or requires a change in the company's procedures or personnel. The goal of this process is to ensure legal compliance and to maximize the performance of Corporate Colocation's personnel.

Reporting Deficiencies

An internal tracking tool is utilized to document and track the results of on-going monitoring procedures. Escalation procedures are maintained for responding and notifying management of any identified risks. Risks receiving a high rating are responded to immediately. Corrective actions, if necessary, are documented and tracked within the internal tracking tool. Annual risk meetings are held for management to review reported deficiencies and corrective actions.

INFORMATION AND COMMUNICATION SYSTEMS

Information Systems

Corporate Colocation, Inc. utilizes commercially available applications to monitor the physical and environmental controls. Corporate Colocation, Inc. does not maintain or have logical access to client's production environments.

Infrastructure

Primary infrastructure used to provide Corporate Colocation's Colocation services system includes the following:

Primary Infrastructure		
Hardware	Type	Purpose
MDF1	Core Arista Data Center Routers	Cisco Nexus Router (Redundant) which does the distribution to all the customers hosted in suite 510
MDF2	Core Arista Data Center Routers	composed of 2 x Cisco 6509 Routers - One of Which Send Traffic to Colo Customers in suite 710 and the Other Dedicated to NedaServer.Net

Software

Primary software used to provide Corporate Colocation's Colocation services system includes the following:

Primary Software	
Software	Purpose
CentOS Linux	Utility servers
Windows	Operating system
PRTG Network Monitor	Monitoring CPU usage
Scrutinizer Analyzer	Netflow analyzer
Cacti	an open-source, web-based network monitoring and graphing tool

Communication Systems

Upper management is involved with day-to-day operations and is able to provide personnel with an understanding of their individual roles and responsibilities pertaining to internal controls. This includes the extent to which personnel understand how their activities relate to the work of others and the means of reporting exceptions to a higher level within Corporate Colocation, Inc. Management believes that open communication channels help ensure that exceptions are reported and acted on. Management's communication activities are made electronically, verbally, and through the actions of management.

COMPLEMENTARY USER ENTITY CONTROLS

Corporate Colocation's services are designed with the assumption that certain controls will be implemented by user entities. Such controls are called complementary user entity controls. It is not feasible for all of the control objectives related to Corporate Colocation's services to be solely achieved by Corporate Colocation control procedures. Accordingly, user entities, in conjunction with the services, should establish their own internal controls or procedures to complement those of Corporate Colocation.

The following complementary user entity controls should be implemented by user entities to provide additional assurance that the control objectives described within this report are met. As these items represent only a part of the control considerations that might be pertinent at the user entities' locations, user entities' auditors should exercise judgment in selecting and reviewing these complementary user entity controls.

Control Objective 1

1. User organizations and subservice organizations are responsible for understanding and complying with their contractual obligations to Corporate Colocation, Inc.
2. User organizations are responsible for notifying Corporate Colocation, Inc. of changes made to technical or administrative contact information.
3. User organizations are responsible for maintaining their own system(s) of record I.
4. User organizations are responsible for ensuring the supervision, management and control of the use of Corporate Colocation, Inc.'s services by their personnel.
5. User organizations are responsible for securing, monitoring and maintaining the key badges assigned to their personnel.

Control Objective 2

6. User organizations are responsible for developing their own disaster recovery and business continuity plans that address the inability to access or utilize Corporate Colocation, Inc.'s services.

SECTION 4

TESTING OF CONTROL OBJECTIVES AND RELATED CONTROL ACTIVITIES PROVIDED BY THE SERVICE AUDITOR

GUIDANCE REGARDING INFORMATION PROVIDED BY THE SERVICE AUDITOR

A-LIGN's examination of the controls of Corporate Colocation was limited to the control objectives and related control activities specified by the management of Corporate Colocation and did not encompass all aspects of Corporate Colocation's operations or operations at user organizations. Our examination was performed in accordance with American Institute of Certified Public Accountants (AICPA) Statement on Standards for Attestation Engagements No. 18 (SSAE 18).

Our examination of the control activities was performed using the following testing methods:

TEST	DESCRIPTION
Inquiry	The service auditor made inquiries of service organization personnel. Inquiries were made to obtain information and representations from the client to determine that the client's knowledge of the control and corroborate policy or procedure information.
Observation	The service auditor observed application of the control activities by client personnel.
Inspection	The service auditor inspected among other items, source documents, reports, system configurations to determine performance of the specified control activity and in some instances the timeliness of the performance of control activities.
Re-performance	The service auditor independently executed procedures or controls that were originally performed by the service organization as part of the entity's internal control.

In determining whether a SSAE 16 report meets the user auditor's objectives, the user auditor should perform the following procedures:

- Understand the aspects of the service organization's controls that may affect the processing of the user organization's transactions;
- Understand the flow of significant transactions through the service organization;
- Determine whether the control objectives are relevant to the user organization's financial statement assertions;
- Determine whether the service organization's controls are suitably designed to prevent or detect processing errors that could result in material misstatements in the user organization's financial statements and determine whether they have been implemented.

CONTROL AREA 1 PHYSICAL SECURITY

Control Objective Specified by the Service Organization: Control activities provide reasonable assurance that business premises and information systems are protected from unauthorized access, damage and interference.

Control Point	Control Activity Specified by the Service Organization	Test Applied by the Service Auditor	Test Results
1.1	The doors at the facility are locked and can only be opened by an authorized key badge card.	Observed the doors at the facility to determine that the doors at the facility were locked and could only be opened an authorized key badge card.	No exceptions noted.
1.2	A visitor access log is used at the facility which identifies the visitor name, arrival and departure date and times.	Inspected data center visitor access logs for a sample of days to determine that a visitor access log was used at the facility which identified the visitor name, arrival and departure date and times.	No exceptions noted.
1.3	A physical access key badge system is in place to control access movement into and throughout the facilities.	Observed the key badge system in operation to determine that a physical access key badge system was in place to control access movement into and throughout the facilities. Inspected the user listing to determine that a physical access key badge system was in place to control access movement into and throughout the facilities.	No exceptions noted. No exceptions noted.
1.4	A key badge assignment listing exists to monitor and maintain user access rights in the facility.	Inspected the key badge cardholder assignment document to determine that a key badge assignment list existed to monitor and maintain user access rights in the facility.	No exceptions noted.
1.5	Authorized personnel can access the key badge system to create and update user access rights.	Inquired of the management regarding the badge access system to determine that authorized personnel could access the key badge system to create and update user access rights. Inspected the key badge system administrator user access list to determine that authorized personnel could access the key badge system to create and update user access rights.	No exceptions noted. No exceptions noted.

CONTROL AREA 1 PHYSICAL SECURITY

Control Objective Specified by the Service Organization: Control activities provide reasonable assurance that business premises and information systems are protected from unauthorized access, damage and interference.

Control Point	Control Activity Specified by the Service Organization	Test Applied by the Service Auditor	Test Results
1.6	Key badge access attempts are logged and can be used for investigative purposes to identify any suspicious activity.	Inspected door access reports for a sample of days to determine that key badge attempts were logged and can be used for investigative purposes to identify any suspicious activity.	No exceptions noted.
1.7	A biometric access control system exists to control access movement into and throughout the data center floor.	Observed the biometric access control system during access to the facility to determine that a biometric access control system existed to control access movement into and throughout the data center floor.	No exceptions noted.
1.8	Cabinets hosting client servers are locked all time in the data center.	Observed the cabinets hosting client servers to determine that cabinets hosting client servers were locked all time in the data center.	No exceptions noted.
1.9	Master keys to data centers and client server cabinets are maintained in a locked box placed in the NOC center. A biometric access control system exists to control access to the box.	Observed the box with master keys in it to determine that master keys to data centers and client server cabinets were maintained in a locked box placed in the NOC center.	No exceptions noted.
1.10	Closed circuit television security cameras are present in the facility which record activity in the facility 24 hours a day, 7 days a week.	Observed the closed-circuit television security cameras to determine that closed circuit television security cameras were present in the facility which recorded activity in the facility 24 hours a day, 7 days a week.	No exceptions noted.

CONTROL AREA 1 PHYSICAL SECURITY

Control Objective Specified by the Service Organization: Control activities provide reasonable assurance that business premises and information systems are protected from unauthorized access, damage and interference.

Control Point	Control Activity Specified by the Service Organization	Test Applied by the Service Auditor	Test Results
1.11	Closed circuit television security cameras are present in the facility which record images to a central digital video recorder (DVR) and the images are stored for a minimum of 30 days.	Inspected the digital security camera system image history and the security camera settings to determine that closed circuit television security cameras were present in the facility which record images to a central digital video recorder (DVR) and the images were stored for a minimum of 30 days.	No exceptions noted.
1.12	Security management is maintained and supported at the facility by a third-party monitoring company.	Observed the third-party security guards on duty during access to the facility to determine that security management was maintained and supported at the facility by a third-party monitoring company.	No exceptions noted.
1.13	An equipment removal authorization form is completed and submitted to the facility security management in order to remove any equipment from the secure facilities.	<p>Inquired of the management regarding equipment removal procedures to determine that an equipment removal authorization form is completed and submitted to the facility security management in order to remove any equipment from the secure facilities.</p> <p>Inspected a sample of completed equipment removal authorization forms to determine that an equipment removal authorization form is completed and submitted to the facility security management in order to remove any equipment from the secure facilities.</p>	<p>No exceptions noted.</p> <p>No exceptions noted.</p>

CONTROL AREA 2 ENVIRONMENTAL SECURITY

Control Objective Specified by the Service Organization: Control activities provide reasonable assurance that critical information technology infrastructure is protected from environmental threats.

Control Point	Control Activity Specified by the Service Organization	Test Applied by the Service Auditor	Test Results
2.1	Fire detection and prevention systems are present throughout the facility including smoke detection devices, hand held fire extinguishers, and pre-action dry pipe fire suppression.	Observed the facility to determine that fire detection and prevention systems were present throughout the facility including smoke detection devices, hand held fire extinguishers, and pre-action dry pipe fire suppression.	No exceptions noted.
2.2	Handheld fire extinguishers are inspected on an annual basis to ensure that the pressure is within the recommended levels.	Observed the handheld fire extinguishers to determine that handheld fire extinguishers were inspected on an annual basis to ensure that the pressure was within the recommended levels.	No exceptions noted.
2.3	The pre-action dry pipe fire suppression systems are tested and inspected by a third-party provider on an annual basis.	Inspected the results of the third-party inspection to determine that the pre-action dry pipe fire suppression systems were tested and inspected by a third-party provider on an annual basis.	No exceptions noted.
2.4	An uninterruptable power supply (UPS) is in place to provide power to critical infrastructure equipment in the event of a temporary power loss or power surge.	Observed the UPS in the facility to determine that an UPS was in place to provide power to critical infrastructure equipment in the event of a temporary power loss or power surge.	No exceptions noted.
2.5	The UPS units are inspected and maintained on an annual basis.	Inspected the results of the annual inspections to determine that the UPS units were inspected and maintained on an annual basis.	No exceptions noted.
2.6	Two 2000KW generators fueled by diesel fuel are in place to provide power to the data center in the event of an extended power outage.	Observed the generators to determine that two 2000KW generators fueled by diesel fuel were in place to provide power to the facility in the event of an extended power outage.	No exceptions noted.
2.7	The generators are tested on a semi-annual basis.	Inquired of the management regarding generator tests to determine that the generators were tested on a semi-annual basis.	No exceptions noted.

CONTROL AREA 2

ENVIRONMENTAL SECURITY

Control Objective Specified by the Service Organization: Control activities provide reasonable assurance that critical information technology infrastructure is protected from environmental threats.

Control Point	Control Activity Specified by the Service Organization	Test Applied by the Service Auditor	Test Results
2.8	Preventive maintenance inspections, service and testing is performed on each of the generators on a semi-annual basis.	<p>Inspected the generator test logs to determine that the generators were tested on a semi- annual basis.</p> <p>Inquired of the management regarding preventative maintenance logs to determine that preventive maintenance inspections, service and testing were performed on each of the generators on a semi-annual basis.</p>	<p>No exceptions noted.</p> <p>No exceptions noted.</p>
2.9	Temperature and humidity sensor systems are in place in the facility that notifies authorized personnel via email distribution group of readings outside of the defined parameters.	<p>Inspected the semi-annual preventive maintenance logs to determine that preventive maintenance inspections, service and testing were performed on each of the generators on a semi-annual basis.</p> <p>Observed the integrated temperature and humidity sensor systems to determine that redundant temperature and humidity sensor systems were in place in the facility that notified authorized personnel via email distribution group of readings outside of the defined parameters.</p> <p>Inspected the configuration of the integrated temperature and humidity sensor systems to determine that redundant temperature and humidity sensor systems were in place in the facility which notified authorized personnel via email distribution group of readings outside of the defined parameters.</p> <p>Inspected an example humidity alert email to determine that redundant temperature and humidity sensor systems were in place in the facility that notified authorized personnel via email distribution group of readings outside of the defined parameters.</p>	<p>No exceptions noted.</p> <p>No exceptions noted.</p> <p>No exceptions noted.</p>

CONTROL AREA 2 ENVIRONMENTAL SECURITY

Control Objective Specified by the Service Organization: Control activities provide reasonable assurance that critical information technology infrastructure is protected from environmental threats.

Control Point	Control Activity Specified by the Service Organization	Test Applied by the Service Auditor	Test Results
2.10	The facility is equipped with multiple computer room air conditioning (CRAC) units that provide redundancy in the event of one unit's failure.	Observed the CRAC units within the facility to determine that facility was equipped with multiple CRAC units that provide redundancy in the event of one unit's failure.	No exceptions noted.
2.11	The CRAC units are inspected and maintained by a third party on a semi-annual basis.	<p>Inquired of the management regarding the CRAC units inspections to determine that the CRAC units were inspected and maintained by a third party on a semi-annual basis.</p> <p>Inspected the most recent inspection and maintenance results for all CRAC units to determine that the CRAC units were inspected and maintained by a third party on a semi-annual basis.</p>	No exceptions noted.
2.12	Integrated water detection sensors exist within the CRAC units to alert personnel of readings outside of the defined parameters.	Observed the integrated water detection sensors to determine that integrated water detection sensors existed within the CRAC units to alert personnel of readings outside of the defined parameters.	No exceptions noted.
2.13	The facility is equipped with multiple airside condenser units that provide cooled air to the data center.	Observed the airside condenser units to determine that the facility was equipped with multiple airside condenser units that provide cooled air to the data center.	No exceptions noted.

CONTROL AREA 3 NETWORK MONITORING AND INCIDENT MANAGEMENT

Control Objective Specified by the Service Organization: Control activities provide reasonable assurance that the communications network is monitored for availability and incidents are tracked and resolved in a timely manner.

Control Point	Control Activity Specified by the Service Organization	Test Applied by the Service Auditor	Test Results
3.1	Two internet backbone connections provide redundancy of internet connectivity into the each of the two data center suites.	Inspected the network diagram to determine that two internet backbone connections provide redundancy of internet connectivity into each of the two data center suites.	No exceptions noted.
3.2	A monitoring application is utilized to monitor network events and alert IT personnel via email when certain predefined thresholds are met.	<p>Inspected the configuration of the reactive monitoring application to determine that a monitoring application was utilized to monitor network events.</p> <p>Inspected the monitoring dashboard and screenshot of an example alert notification to determine that a monitoring application was utilized to monitor network events and alert IT personnel via email when certain predefined thresholds were met.</p>	<p>No exceptions noted.</p> <p>No exceptions noted.</p>
3.3	Network incidents are logged in a central ticketing system and resolution of the ticket is documented.	Inspected a sample of network incidents tickets to determine that network incidents were logged in the ticketing system and resolution of the ticket was documented.	No exceptions noted.