

1 Overview

This Statement of Work (“SOW”), with any appendices included by reference, is part of any agreement which incorporates this document by reference.

1.1 Services Summary

The purpose of the Compliance Gap/Readiness Review is to identify potential gaps that may exist in Customer’s ongoing compliance efforts. The assessment procedures are based on the latest NIST CSF Security Standards as updated by the National Institute of Standards and Technology Organization (NIST). This project will focus on Customer’s policies, procedures, practices, information technology (IT) environment and existing compliance efforts. SilverSky will document identified weaknesses and provide recommendations to help Customer enhance its security and compliance program.

Project Deliverables:

- Reports: Executive Summary and NIST CSF GAP/Readiness Detailed Findings Report

1.2 Project Summary

SilverSky will provide the following primary tasks, subject to modification or extension based the engagement.

1. Preparation and Scoping
2. Information Gathering/Discovery
3. Gap Analysis
4. Policy Analysis
5. Analysis and Reporting

2 Scope

2.1 SILVERSKY Systems Obligations:

Preparation and Scoping - Meet with key personnel to discuss Customer’s operational and technical environment. During this initial conversation SilverSky will determine the scope of Customer IT environment that falls under NIST CSF regulations, including considerations for outsourced arrangements, network segmentation and third party processing providers. The preparation and scoping phase is used to:

- Set expectations regarding the project scope, objectives, activities and associated timetables over the course of the engagement
- Establish roles and responsibilities for both Customer and SilverSky teams
- Establish project management standards, including milestone meetings, status reports and ongoing communications with key personnel
- Facilitate collection of Customer specific information that is required to complete the NIST CSF Gap Assessment

Information Gathering - Review existing Customer documents related to NIST CSF compliance and interview Customer personnel. SilverSky may require further interviews and documentation throughout the process. Samples of requested documentation will include:

- Prior IT or Operation Risk Assessments
- Network diagrams
- Security and compliance training programs
- Information security policies and procedures
- Workforce training program documentation
- IT organizational charts
- Security software and hardware lists
- Interview schedules with key personnel

SilverSky Proprietary

SilverSky will utilize the information gathered to better focus and streamline the client interviews. SilverSky will schedule a combination of group and individual interviews with personnel from various functional areas. The interview process will focus on the areas outlined in the NIST CSF standard.

NIST CSF Gap Analysis - Evaluate the in-scope processes, systems and applications against the requirements of the NIST CSF standards. SilverSky will examine the security and control structure or related information systems and business processes that are involved in Customer's collection, use and disclosure of sensitive information to determine adequacy of controls. During this phase SilverSky will:

- Assess how controls have been deployed to support key business processes, technology infrastructure, and relevant systems.
- Interview key system and business stakeholders to identify current policies and practices related to information security
- Identify and assess information security risks within key functional areas associated with the information security program
- Evaluate your current risk management techniques for addressing security and privacy risks
- Identify deficiencies and gaps in security and privacy practices through targeted tests and control analysis
- Develop detailed recommendations to assist Customer's remediation of deficiencies

SilverSky will review the following key security management areas for compliance with NIST CSF 27001 security requirements:

1. Security Policy
2. Organization of Information Security
3. External Party Management
4. Asset Management
5. Human Resource Security
6. Physical and Environmental Security
7. Communications and Operations Management
8. Access Control
9. Information systems acquisition, development and maintenance
10. Information Security Incident Management
11. Business Continuity Management
12. Compliance and Legal

NIST CSF Security Policy Review - Review and audit customer security policies for compliance with NIST CSF requirements and guidelines. SilverSky will perform a gap analysis of existing Customer policies and procedures against NIST CSF requirements to provide a suggested roadmap for compliance. SilverSky will present all findings during this review to allow for Customer's remediation of any missing documentation as early as possible. In addition, SilverSky will review Customer's process documents and plans for all NIST CSF -related requirements (e.g., software development, incident response, access request forms and termination checklists).

Analysis and Reporting - Analyze the data generated from SilverSky's review. SilverSky will categorize the gap analysis by severity depending on the potential impact each gap may have with respect to compliance with the NIST CSF security standards. SilverSky will make recommendations to help Customer formulate a strategic plan to address any non-compliant areas.

2.2 Deliverables

Deliverables

SilverSky will provide an Executive Report and a Detailed Findings Report following its review.

The Executive Report is a high level summary of the review designed for Customer's upper management and board of directors and includes:

- 1 page executive summary
- Concise list of the key findings
- Summary of SilverSky's findings for each area reviewed during the review
- High level recommendations for addressing deficiencies

The Detailed Findings Report describes the review results in detail. It's designed for your mid-level management, administrators and other operations personnel and includes:

- Itemized listing and description of the areas reviewed
- Identified deficiencies
- Overall risks associated with deficiencies
- Detailed recommendations for addressing deficiencies

2.3 Out of Scope

Any activity not explicitly included in this SOW is considered out of scope. In the event that Customer requests additional services, such services will be the subject of a change request.

3 Customer Obligations and Assumptions

Services, fees and work schedule are based upon the assumptions, representations and information supplied by Customer. Customer’s fulfilment of these responsibilities is critical to the success of the engagement.

3.1 Customer Obligations

- **Project Liaison** - Designate an authorized representative to authorize completion of key project phases, assign resources and serve as project Liaison.
- **Access** - Ensure SILVERSKYS consultants have access to key personnel and data requested.
- **Resources** - Furnish SILVERSKYS with Customer personnel, facilities, resources and information and perform tasks promptly.
- **Cooperation** - Ensure all of Customer’s employees and contractors cooperate fully with SILVERSKYS and in a timely manner. SilverSky will advise Customer if an increased level of Customer participation is required in order for SILVERSKYS to perform the Services under this Service Description.
- **Documentation** - Timely deliver all documentation requested by SilverSky including Customer’s security policies, network diagrams, server listings and procedures.

3.2 SilverSky Assumptions

- Customer will provide SilverSky with reasonably requested information upon which SilverSky can rely to be accurate and complete.
- Customer will provide access to Customer’s personnel who have detailed knowledge of Customer security architecture, network architecture, compute environment and related.
- Customer will provide access to Customer’s personnel who have an understanding of Customer’s security policies, regulations and requirements.
- Customer will evaluate SILVERSKYS deliverables and immediately notify SilverSky of any perceived problems or issues with SilverSky obligations.
- SilverSky will immediately notify Customer of any perceived problems or issues regarding Customer obligations.
- Customer is responsible for any additional costs in the event that SilverSky is unable to perform the Services due to Customer’s delay or other failure to fulfill its obligations under this Statement of Work.

4 Project Parameters

4.1 Project Scope

The scope of the project is based on the above description with the additional details listed as follows:

Project Component	Parameter(s)
Project Start Date	Typically within 30 days of Effective Date
Project Duration	Tier 1: Approximately 1 week Tier 2: Approximately 2 weeks Tier 3: Approximately 3 weeks
<u>Description</u>	<u>Consulting Days not to Exceed</u>
NIST CSF Compliance GAP/Readiness Review - Tier 1	5
NIST CSF Compliance GAP/Readiness Review - Tier 2	10
NIST CSF Compliance GAP/Readiness Review - Tier 3	13

Pricing is based upon your Tier of service and you are not allowed to downgrade if the engagement last less than your maximum days set forth in the table above.

4.2 Location and Travel Reimbursement

The Services defined in this SOW may require onsite participation by Silversky staff at customer location(s).

For Customer-approved onsite participation, Customer will be invoiced for all actual SILVERSKYS staff travel and living expenses associated with all onsite visits. An administration fee of ten percent (10%) of all travel and living expenses will be billed to Customer if Customer requires an itemized statement of such expenses.

Location	Scope of Work

4.3 Acceptance

Delivery of all stated project deliverables will constitute acceptance of services provided under this SOW.

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