



COMPLIANCE OVERVIEW

KIVVIK OVERVIEW

Kivvik hosts its application with leading infrastructure and hosting services, including Amazon EC2 and S3 (NASDAQ: AMZN). We apply security controls at every layer from physical to application and isolate customer applications and data. We also apply best practices and other security techniques to ensure the safety and security of our customer data.

SECURITY ASSESSMENTS AND COMPLIANCE

APP DEVELOPMENT

Kivvik follows best practices of application development and prevents common web software attacks. We use modern technologies and update of our application framework for newly discovered security vulnerabilities. Our development process includes continuous vulnerability scanning to ensure we are maintaining a high level of security in our codebase.

DATA CENTERS

Kivvik's physical infrastructure is hosted and managed within Amazon's secure data centers and utilize the Amazon Web Service (AWS) technology. Amazon continually manages risk and undergoes recurring assessments to ensure compliance with industry standards. Amazon's data center operations have been accredited under; ISO 27001, SOC 1 and SOC 2/SSAE 16/ISAE 3402, PCI Level 1, FISMA Moderate, Sarbanes-Oxley.

BANK-LEVEL ENCRYPTION

Our application traffic runs entirely over 256-bit encrypted SSL (https). Passwords are hashed before storing using bcrypt with a cost factor of 10 and application credentials are kept separate from the database and our code base. Additionally, sensitive data is stored in an encrypted format while at rest.

DATA RELIABILITY & BACKUP

All user data on Kivvik is backed up nightly and stored in multiple physical locations to prevent data loss. We have the ability to do point-in-time recovery of our entire database in the event of a system-wide emergency.

PCI – PAYMENT DATA

Kivvik uses PCI compliant payment processor Stripe for encrypting and processing credit card payments. Braintree Payments has been audited by a PCI-certified auditor, and is certified to PCI Service Provider Level 1. This is the most stringent level of certification available. Credit card numbers are not stored on the Kivvik platform.

PHYSICAL SECURITY

Kivvik utilizes ISO 27001 and FISMA certified data centers managed by Amazon. Amazon has many years of experience in designing, constructing, and operating large-scale data centers. This experience has been applied to the AWS platform and infrastructure. AWS data centers are housed in nondescript facilities, and critical facilities have extensive setback and military grade perimeter control berms as well as other natural boundary protection. Physical access is strictly controlled both at the perimeter and at building ingress points by professional security staff utilizing video surveillance, state of the art intrusion detection systems, and other electronic means. Authorized staff must pass two-factor authentication no fewer than three times to access data center floors. All visitors and contractors are required to present identification and are signed in and continually escorted by authorized staff.

Amazon only provides data center access and information to employees who have a legitimate business need for such privileges. When an employee no longer has a business need for these privileges, his or her access is immediately revoked, even if they continue to be an employee of Amazon or Amazon Web Services. All physical and electronic access to data centers by Amazon employees is logged and audited routinely.

POWER

The data center electrical power systems at Amazon are designed to be fully redundant and maintainable without impact to operations, 24 hours a day, and seven days a week. Uninterruptible Power Supply (UPS) units provide backup power in the event of an electrical failure for critical and essential loads in the facility. Data centers use generators to provide backup power for the entire facility.

FIRE DETECTION AND SUPPRESSION

Automatic fire detection and suppression equipment has been installed to reduce risk at Amazon facilities. The fire detection system utilizes smoke detection sensors in all data center environments, mechanical and electrical infrastructure spaces, chiller rooms and generator equipment rooms. These areas are protected by either wet-pipe, double-interlocked pre-action, or gaseous sprinkler systems.

CLIMATE AND TEMPERATURE CONTROL

Climate control is required to maintain a constant operating temperature for servers and other hardware, which prevents overheating and reduces the possibility of service outages. Data centers are conditioned to maintain atmospheric conditions at optimal levels. Monitoring systems and data center personnel ensure temperature and humidity are at the appropriate levels.

MANAGEMENT

Data center staff at Amazon monitor electrical, mechanical and life support systems and equipment so issues are immediately identified. Preventative maintenance is performed to maintain the continued operability of equipment.

CLIENT COMMUNICATION:

This section details the information we allow clients to submit to their respect advisors. The content is structured based on the topics available on the Kivvik platform followed by a svstructured view of the possible response we have allowed.

EMAILS:

Additionally, all emails to clients receive emails that use the advisors email address. If the client were to respond to an outreach from Kivvik, it will flow directly to the advisor by-passing Kivvik; this enables us to by pass the issue of correspondence.

ARCHIVING:

We allow advisors to easily export all communication with their client via our account settings page on the dashboard. The export function pulling all data from the inception of the account, allowing for complete transparency and aids in data archiving.

TOPIC OVERVIEW:

This is a list of the 13 topic areas we address. 1. Expecting a Child, 2. College Saving, 3. Vehicle transactions, 4. Travel Plans, 5. Marital Status, 6. Separation and Divorce, 7. Real Estate, 8. Renovations, 9. Retirement, 10. Employment, 11. Health Issues, 12. Inheritance, 13. Miscellaneous Topics.

1. EXPECTING A CHILD

Question 1:

We inquire into the expected time frame for the new child. Child is defined as a direct offspring, adoption or any other like types. Client has the option to select a specific month within the next year starting from the current month, select “within a year” if unsure of the exact month, or “in the future” for a date that exceeds a year.

Question 2:

We inquire into the status of planning for college savings. This question is a simple yes or no selection as to give a high level set of responses to the advisor.

Question 3:

We inquire into the status of the insurance planning after the consideration for a new dependent. We ask about the status of Long-term, Life, Health, Disability, Critical Illness Insurance.

Question 4:

We inquire into whether the client would like to discuss insurance changes with the advisor.

Question 5:

We inquire into whether the new dependent is the first child, as this give the advisor more context and avenues to assist the client.

2. COLLEGE SAVINGS

Scope:

We inquire into high-level college savings plans that have not been discussed with the advisor. This includes personal savings, saving for a dependent or savings for another individual. The initial question looks into the proposed time frame for when the individual would like to begin saving.

Question 1:

Initially the Client has the option to select a specific month within the next year starting from the current month, select “within a year” if unsure of the exact month, or “in the future” for a date that exceeds a year.

Question 2:

The next phase of our inquiry allows the client to select a timeframe for when they will expect to start making tuition payments. This give the advisor time horizon context into the client’s needs. We allow the client to select from the following options: Already Started, This coming year, less than 5 years from now, and lastly further in the future.

Question 3:

The final set of inquire for college savings dives in to the beneficiary of the funds. We give the clients the following options to choose from; Personal, for whether it’s for themselves; Spouse, for whether it’s from a legal partner; Child, for whether it’s for a direct descendent; Other family member, for whether it’s for a legal family member; and lastly Non-family member, for someone outside the scope of a legally defined family.

3. VEHICLE

Scope:

The vehicle inquire allows clients to disclose whether they’ve recently had a vehicle transaction or are planning on a near future vehicle transaction.

Question 1:

The initial inquiry into a vehicle transaction allows the client to select the kind of vehicle he/she will be making a transaction on. The preset options are Car, RV, Boat, Motorcycle, Bus and Van.

Question 2:

The second question in the vehicle topic allows the client to specify the kind of transaction they are planning on conducting. The client has the option to select purchasing, selling or leasing.

Question 3:

The third question in the vehicle topic allows the client to identify when they will be making the vehicle transaction. The preset options provide are: a month selector for within the year, within a year if a month is unknown, and in the future for when the transaction is beyond the scope of a year.

Question 4:

The fourth question in the vehicle topic allows the client to identify the price range they are willing to either pay or receive for the vehicle. The options for a purchase include; \$0-20K, \$21-40K, \$41-60K, \$61-80K and \$80K+. The options for a lease include: \$0-300, \$301-600, \$601-900, and \$900+.

Question 5:

The fifth and final question in the vehicle topic allows the client to disclose the reason for purchasing or leasing the vehicle. The preset options include; personal use, business or retirement.

4. TRAVEL

Scope:

The travel topic allows clients to share any upcoming trips that may be of use to the advisor to know, in order to help them plan accordingly.

Question 1:

The initial inquiry into the travel topic allows the client to disclose where they are planning a trip to. This gives the advisor context as to whether it will be costly to the client. The input is a basic text box that is limited to 30 characters.

Question 2:

The second phase of the travel topic allows the client to identify the date they plan on beginning the trip. The options include a month selector, within a year or in the future.

Question 3:

The third question in the travel topic allows the client to disclose the proposed length of the trip. The preset options are: less than a week, less than a month, less than 3 months, and lastly more than 3 months.

Question 4:

The final phase of the travel inquiry allows the client to give the advisor an estimate on how much the planned trip will cost. The options include: less than \$1000, less than \$5000, less than \$10,000 and lastly more than \$10,000.

5. MARRIAGE

Scope:

The marriage topic allows clients to easily disclose any current and upcoming changes in their marital status. The key options we focus on include, planning an engagement, engaged, and currently married.

Question 1:

Allows the client to specify which of the 3 sub-topics is currently occurring in their lives. The options are planning an engagement, engaged, and currently married.

Question 2a:

If planning an engagement, the client is asked whether they are planning on purchasing an engagement ring.

Question 3a:

Based on question 2a's response if positive, the client is then asked to identify a timeframe for the ring purchase. The preset options provided include; a month selector, less than 6 months from now, with a year, or in the future.

Question 4a:

Based on 2a's input if positive the client is asked whether or not they are planning on insuring the ring.

Question 2b:

If engaged is selected the client is asked when they are planning on a marriage. The options include a month selector, less than 6 months from now, within a year and finally in the future.

Question 3b:

Once set 2b is completed the client is asked to select their projected budget for the wedding. The options include under \$25K, under \$50K, under \$100K, under \$500K, over \$500K and lastly unknown.

Question 4b:

Once the initial engagement questions are complete the client is asked insurance questions. That gauge whether they have taken insurance changes due to an upcoming marriage into consideration. The questions policies include: life, long-term, health, disability, critical illness or no I haven't considered a change.

Question 5b:

the last inquire in the engagement section allows the client to select insurance policies they would like to discuss with the advisor based on their previous inputs from Question 4b.

Question 2c:

If currently married the client is asked when they got married. The options presented allows for an exact date selection.

Question 3c:

The following question dives into insurance considerations. The questions gauge whether they have make insurance changes due to the marriage. The questions policies include: life, long-term, health, disability, critical illness or no I hav-

en't considered a change.

Question 4b:

the last inquire in the engagement section allows the client to select insurance policies they would like to discuss with the advisor based on their previous inputs from Question 3b.

6. SEPARATION / DIVORCE

Scope:

The separation / divorce topic allows clients to easily disclose any changes in their marital status.

Question 1:

The initial inquiry allows clients to select the current status of their situation. The options provided include separated and divorced.

Question 2:

If separated is selected the clients is then asked when the separation occurred / is occurring. The options include, in the last year, in the last 3 months, this month and lastly in the future.

Question 3:

Once question 2 is answered the client is asked a final question regarding the anticipation of a divorce. The options are a simple yes or no selection.

Question 2b.

If divorced is selected the client is asked a final question regarding the time the divorce took place. The options include in the last year, in the last 3 months and the current month.

7. REAL ESTATE

Scope:

The scope of the real estate topic is to allows the client to disclose future plans to purchase, sell or lease property.

Question 1:

The initial question in the Real-Estate topic allows the client to identify the type of property they are considering. The options include, a home, an apartment, land, investing, a vacation home or commercial property.

Question 2:

The following question allows the client to identify the type of transaction that is occurring. The options include a purchase, a sale, or a lease of a property.

Question 3:

The third question in the real-estate inquiry allows the client to identify a time frame for the transaction. The options include: a month selector, within a year, in the future, or already occurred.

Question 4:

The fourth question in the real-estate inquiry allows the client to select an expect cost of the property. The options vary based on the transaction type. The options for purchasing or selling include less than \$250K, less than \$500K, less than \$750K, less than \$1M, or more than \$1M. The options for leasing include: less than \$5L, less than \$15K, less than \$30K, less than \$100L, over \$100K.

Question 5:

The final question in the real estate inquiry allows the client to disclose the whether the transaction leads to a change in permanent residence. The option is a simple Yes/No selection.

8. RENOVATIONS

Scope:

The renovations topic allows the client to disclose any plans to make renovations to any type of property.

Question 1:

The initial question allows the client to specify when they are planning on making the renovations. The input is a simple date input with months in for the next 12 months; in the future; or already occurred.

Question 2:

The second question allows the client to disclose the estimated cost of the renovations. The options are under \$10K, under \$25K, under \$50K, under \$100K or over \$100K.

Question 3:

The third question allows the client to disclose the time frame for the project. The options include less than 1 month, less than 3 months, less than 6 months, and lastly over 6 months.

Question 4:

The fourth question allows the client to describe the space they will be renovating. The input is a simple text input limited to 30 characters.

Question 5:

The last question inquires the purpose of the renovations. The client is given 2 options; personal or investment.

9. RETIREMENT

Scope:

The retirement topic allows the client to notify their advisor of a change to their retirement plans.

Question 1:

The initial and only question allows the client to answer the simple question of whether they would like to review their retirement plan with the advisor. The options are a simple yes or no input.

10. EMPLOYMENT

Scope:

The employment topics dig into changes in the client's employment status. The sub-topic options include: unemployment, new job, self-employment, and career prospecting.

Question 1:

The initial inquiry allows the client to identify the type of employment that is currently occurring. The options are unemployment, new job, self-employment, and career prospecting.

Question 2a:

If the client selects New Job, they are then asked to specify the timeframe the new job occurred/is occurring. The input options are within a year, in the future, less than 3 months ago, and within the last year.

Question 3a:

The following question allows the client the opportunity to state whether they have altered their insurance policies to reflect the change in their job. The options they can review include; long-term, life, health, disability, critical illness, or no I haven't reviewed my policies.

Question 4a:

The following question to the insurance probe asks the client if they would like to review their insurance policies with their advisor.

Question 2b:

If the client selects Self-Employed they are asked when they became self-employed / when they will become self-employed. The options include a month selector, within a year, in the future, less than 3 months ago, and within the last year.

Question 3b:

The following question allows the client the opportunity to state whether they have altered their insurance policies to reflect the change in their job. The options they can review include; long-term, life, health, disability, critical illness, or no I

haven't reviewed my policies.

Question 4a.

The following question to the insurance probe asks the client if they would like to review their insurance policies with their advisor.

Question 2c:

If the client selects Career Prospecting, they are asked a simple date question on when they are expecting to make the transition. The options presented are a month selector, within a year, and in the future.

Question 2d:

If the client selects unemployment, they are first asked the date the unemployment occurred / is expected to occur. The options are a simple month selection, within a year, in the future, less than 3 months ago and within the last year.

Question 3d:

The following question allows the client the opportunity to state whether they have altered their insurance policies to reflect the change in their job. The options they can review include; long-term, life, health, disability, critical illness, or no I haven't reviewed my policies.

Question 4d.

The following question to the insurance probe asks the client if they would like to review their insurance policies with their advisor.

11. HEALTH ISSUES

Scope:

The health issues topic allows the client to easily report any current and expected health issues that is occurring in their lives.

Question 1:

The initial inquiry in the health issues topic allows the client to identify the individual experiencing the health issue. The preset options include personal, spouse, child, dependent or other individual.

Question 2:

The following questions asks when the health issues are to be expected. The options include a month selector, and expected in the future.

Question 3:

This is an optional question that allows the client to disclose any information they will like to the advisor. The input option is a text input that is limited to 200 characters.

12. INHERITANCE

Scope:

The inheritance topic allows the client to disclose any inheritances they have received or are planning on receiving.

Question 1:

The initial question probes into when the client is expecting an inheritance. The input options include a month input, within a year, in the future, less than 3 months ago or within the last year.

Question 2:

The following questions looks to see if the client has considered the tax implications of the inheritance. There is a simple yes or no input.

Question 3:

The last question in the heritance topic allows the client to leave any additional notes on the inheritance to their advisor. The client is given a text input with a limit of 200 characters.

13. MISCELLANEOUS

Scope:

The miscellaneous topic allows the client to input any kind of event feedback to the advisor. The client is presented with a subject line and simple input.