



BMW Service Provider Checklist - July

Questions	Response
2. Provide name and contact information for individual responsible for your organization's information security compliance.	<p>Name: _____Jennifer Rosario_____</p> <p>Title: _____CISO_____</p> <p>Address: _____300 Morris Street STE 300_____</p> <p>_____Durham NC 27701_____</p> <p>_____</p> <p>E-mail: _____jrrosario@spreadly.com_____</p> <p>Phone: _____888-727-7750_____</p>
3. Whose <i>Personal Information</i> will you access in connection with the performance of services for BMW?	<p>Check all that apply:</p> <p><input type="checkbox"/> XX Customers/Prospective Customers</p> <p><input type="checkbox"/> XX BMW employees</p> <p><input type="checkbox"/> Investors</p> <p><input type="checkbox"/> Website visitors</p> <p><input type="checkbox"/> XX BMW contractors, consultants,</p> <p><input type="checkbox"/> suppliers Others (please specify):</p> <p>_____</p>

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4. What types of <i>Personal Information</i> will you access?	<p>Check all that apply:</p> <p><input type="checkbox"/> XX Customer names</p> <p><input type="checkbox"/> Employee names</p> <p><input type="checkbox"/> XX Residential or other physical address (e.g., street name, name of city or town, etc.)</p> <p><input type="checkbox"/> XX Email address</p> <p><input type="checkbox"/> Other online contact information (e.g., an instant messaging user identifier or a screen name that reveals an individual's email address);</p> <p>Please specify: _____</p> <p><input type="checkbox"/> XX Credit or debit card information, including card number, expiration date and data stored on the magnetic or strip of a credit or debit card;</p> <p>Please specify: <u>Data used for transaction processing</u></p> <p><input type="checkbox"/> Bank account information, including account, routing, branch, transit and/or cheque numbers;</p> <p><input type="checkbox"/> Telephone number</p> <p><input type="checkbox"/> Social Security Number / Social Insurance Number</p> <p><input type="checkbox"/> Customer Medical information</p> <p><input type="checkbox"/> Recruitment information (e.g. job applications, resumes, educational histories etc.)</p> <p><input type="checkbox"/> Employee Medical information (e.g. pre-employment medical)</p> <p><input type="checkbox"/> Drug or Alcohol test information</p> <p><input type="checkbox"/> Employment Equity status information</p> <p><input type="checkbox"/> Employee background verification information (e.g. employment history checks, credit checks, criminal background checks etc.)</p> <p><input type="checkbox"/> Payroll information (e.g. pay stubs, tax forms etc.)</p> <p><input type="checkbox"/> Benefits information (e.g. pension statements, health insurance etc.)</p> <p><input type="checkbox"/> Workers' Compensation information (e.g. disability claims)</p> <p><input type="checkbox"/> Risk Management information (e.g. incident descriptions, witness information, insurance claims etc.)</p> <p><input type="checkbox"/> Civil recovery information (e.g. incident descriptions, witness contact information, surveillance records etc.)</p> <p><input type="checkbox"/> Travel information (e.g. itineraries, loyalty program information etc.)</p> <p><input type="checkbox"/> Relocation information (e.g. immigration applications etc.)</p> <p><input type="checkbox"/> Stock or Stock Options purchase plan information</p> <p><input type="checkbox"/> Investor relations information</p> <p>Please specify: _____</p> <p><input type="checkbox"/> Employee performance-related information (e.g. performance reviews, evaluations,</p> <p><input type="checkbox"/> Commercial and/or non-commercial driver's license information, including driver's license numbers, gender, height, driving restrictions</p> <p><input type="checkbox"/> Military or provincial identification number</p> <p><input type="checkbox"/> VIN (Vehicle Identification Number)</p>

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Questions	Response
(... Continued)	
4. What types of <i>Personal Information</i> will you access?	<div><input type="checkbox"/> A persistent identifier, such as a customer number held in a “cookie” or processor serial number, that is combined with other information that identifies a customer</div> <div><input type="checkbox"/> Customer credit history information</div> <div><input type="checkbox"/> Any information that is combined with any of the elements listed above; Please specify: _____</div> <div><input type="checkbox"/> Other (please specify): _____</div>
<hr/>	
5. Will you store, process, handle or transmit credit, debit or other payment card data in connection with the performance of services for BMW?	<div><input type="checkbox"/> <b>XX</b>Yes</div> <div><input type="checkbox"/> No</div> <div>Are you fully compliant with the Payment Card Industry Data Security Standard (“PCI DSS”)?</div> <div><input type="checkbox"/> <b>XX</b>Yes</div> <div><input type="checkbox"/> No</div> <div>If you checked “no,” please describe any non-compliance.</div> <div>Which organization certified your compliance with PCI DSS?</div> <div><b>Sikich</b></div> <div>What is the date of certification?</div> <div><b>October 24, 2024</b></div>
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6. Describe the purposes for which you will access <i>Personal Information</i> collected, used, disclosed, or maintained by BMW.	<p>Check all that apply:</p> <p><input type="checkbox"/> <b>XX Transaction processing (e.g. payment card processing)</b></p> <p><input type="checkbox"/> Customer surveys</p> <p><input type="checkbox"/> Email marketing</p> <p><input type="checkbox"/> BMW Customer service</p> <p><input type="checkbox"/> Customer credit check</p> <p><input type="checkbox"/> Civil Recovery</p> <p><input type="checkbox"/> Investor Relations</p> <p><input type="checkbox"/> Lead tracking (e.g. inbound e-mail contact tracking)</p> <p><input type="checkbox"/> Direct mail marketing</p> <p><input type="checkbox"/> BMW website functions (not including analytics, statistics, or tracking)</p> <p><input type="checkbox"/> BMW website analytics, statistics</p> <p><input type="checkbox"/> Sweepstakes or contests</p> <p><input type="checkbox"/> Focus groups</p> <p><input type="checkbox"/> Online communities</p> <p><input type="checkbox"/> Other marketing</p> <p><input type="checkbox"/> research</p> <p>Please specify: _____</p> <p><input type="checkbox"/> Managing and maintaining BMW customer information</p> <p><input type="checkbox"/> Disposal of information (e.g., shredding, burning, pulverizing) Payroll processing</p> <p><input type="checkbox"/> Human resources related</p> <p><input type="checkbox"/> BMW employee benefits (incl. pension, healthcare, and stock plans)</p> <p><input type="checkbox"/> Employee training</p> <p><input type="checkbox"/> Drug, alcohol, and/or controlled substances testing</p> <p><input type="checkbox"/> Medical testing</p> <p><input type="checkbox"/> Relocating Employees</p> <p><input type="checkbox"/> Driver's license reviews (incl. personal and commercial licenses)</p> <p><input type="checkbox"/> Background verifications (e.g. employment history checks, credit checks, criminal background checks etc.)</p> <p><input type="checkbox"/> Other</p> <p>Please specify: _____</p>
7. Describe the sources from which you will obtain <i>BMW Personal Information</i> .	<p>Check all that apply:</p> <p><input type="checkbox"/> <b>XX Customers/Prospective</b></p> <p><input type="checkbox"/> <b>Customers</b> BMW employees</p> <p><input type="checkbox"/> Investors</p> <p><input type="checkbox"/> Government</p> <p><input type="checkbox"/> Other BMW Service Providers (e.g. a payroll processor, website host etc.); Please specify: _____</p> <p><input type="checkbox"/> Other (please specify): _____</p>
8. Specify the media through which you will obtain or access <i>BMW Personal Information</i> .	<p>Check all that apply:</p> <p><input type="checkbox"/> Paper Copy (e.g. forms etc.)</p> <p><input type="checkbox"/> <b>XX Electronic (e.g. information submitted through website, via email or located in BMW database or electronic system etc.)</b></p> <p><input type="checkbox"/> Call centre</p> <p><input type="checkbox"/> Other</p> <p>Please specify: _____</p>

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9. Describe the means by which BMW <i>Personal Information</i> will be transferred to and from your organization.	<p>Check all that apply:</p> <p><input type="checkbox"/> <b>XX</b> Secure FTP</p> <p><input type="checkbox"/> SSL-based protocol (Secure Sockets Layer)</p> <p><input type="checkbox"/> TLS-based protocol (Transport Layer Security) VPN connection</p> <p><input type="checkbox"/> Unencrypted internet connection</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> Telephone</p> <p><input type="checkbox"/> Fax</p> <p><input type="checkbox"/> Secure and trackable mail delivery service (e.g. FedEx, UPS, DHL etc.)</p> <p><input type="checkbox"/> Interoffice envelope</p> <p><input type="checkbox"/> Other</p> <p>Please specify: _____</p>
10. Specify individuals and entities associated with you that will have access to BMW <i>Personal Information</i> .	<p>Check all that apply:</p> <p><input type="checkbox"/> <b>XX</b> Your employees</p> <p><input type="checkbox"/> <b>XX</b> Your contractors or consultants</p> <p>Please specify: <b>GDPR Subprocessors</b></p> <p><input type="checkbox"/> Your marketing partners</p> <p>Please specify: _____</p> <p><input type="checkbox"/> BMW service providers (e.g. payroll processor, website host etc.); Please specify: _____</p> <p><input type="checkbox"/> Others</p> <p>Please specify: _____</p>
11a. In which jurisdictions will you make BMW <i>Personal Information</i> available?	<p>List the jurisdictions where BMW <i>Personal Information</i> may be transferred, and describe the purpose of the transfer of the information.</p> <p>USA - via AWS</p>
11b. In which jurisdictions will BMW <i>Personal Information</i> be stored?	<p>List the jurisdictions where BMW <i>Personal Information</i> may be stored.</p> <p>USA -</p>

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Questions	Response
12a. Describe the means by which you will transmit BMW <i>Personal Information</i> to third parties.	<p>Check all that apply:</p> <p><input type="checkbox"/> Secure FTP</p> <p><input type="checkbox"/> SSL-based protocol (Secure Sockets Layer)</p> <p><input checked="" type="checkbox"/> <b>XX</b> TLS-based protocol (Transport Layer Security)</p> <p><input type="checkbox"/> VPN connection</p> <p><input type="checkbox"/> Unencrypted internet connection</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> Telephone</p> <p><input type="checkbox"/> Fax</p> <p><input type="checkbox"/> Secure and trackable mail delivery service (e.g., FedEx, UPS, DHL etc.)</p> <p><input type="checkbox"/> Interoffice envelope</p> <p><input type="checkbox"/> Other (please specify): _____</p>
12b. Describe the third parties who will have access to BMW <i>Personal Information</i> .	<p>Please provide the third parties legal names. See <b>Spreedly Subprocessor List</b>: <a href="https://www.spreedly.com/gdpr-subprocessors">https://www.spreedly.com/gdpr-subprocessors</a></p> <p>Please specify their type of work.</p> <p>What type of access will they have to BMW <i>Personal Information</i>?</p>
12c. How do you monitor and oversee your third party service providers and their security initiatives?	<p>Please describe your policies and procedures.</p> <p><b>See IS Program Document in Whistic Profile</b></p> <p>_____</p> <p>_____</p>
13. Describe the media in which you will store electronic BMW <i>Personal Information</i> .	<p>Please check all that apply:</p> <p><input type="checkbox"/> Email folders</p> <p><input checked="" type="checkbox"/> <b>XX</b> Third-party servers</p> <p><input type="checkbox"/> Your servers</p> <p><input type="checkbox"/> Your computers (e.g. laptop computers, desktop computers etc.)</p> <p><input type="checkbox"/> Portable electronic devices (e.g., CDs, DVDs, tapes, flash drives, etc.)</p> <p><input type="checkbox"/> Hard-copy (e.g., e-mail print-outs, hard copy sweepstakes submissions, etc.)</p> <p><input type="checkbox"/> Other (please specify): _____</p>
14. Describe the physical location you will use to store hard-copy BMW <i>Personal Information</i> .	<p>Check all that apply:</p> <p><input checked="" type="checkbox"/> <b>XX</b> Controlled-access facilities</p> <p><input type="checkbox"/> Controlled-access rooms</p> <p><input type="checkbox"/> Locked file cabinets</p> <p><input type="checkbox"/> Other (please specify): _____</p>

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Questions	Response
<b>15. Describe your back-up procedures for electronic BMW Personal Information.</b>  <b>See IS Program Document in Whistic Profile.</b>	<p>By what method is the information backed-up (e.g., tape, disk, etc.) ?</p> <p>How often is the information backed-up?</p> <p>Where are back-ups maintained (e.g. offsite)?</p> <p>How long are back-ups maintained?</p> <p>How often are back-ups disposed of?</p> <p>How are back-ups disposed of (e.g., recycled, physically destroyed, etc.)?</p> <p>Are certificates of secure destruction produced when back-ups are disposed of?</p>
<b>16. Describe how you dispose of hard-copy BMW Personal Information.</b>	<p>Please check all that apply:</p> <p><input type="checkbox"/> Burning</p> <p><input type="checkbox"/> Pulverizing</p> <p><input type="checkbox"/> Cross-cut Shredding</p> <p><input type="checkbox"/> Using a qualified service provider (please specify the service provider): _____</p> <p><input type="checkbox"/> Other methods _____</p> <p>Please specify: _____</p>
<b>17. Do you have a policy or procedure for disposing of Personal Information when it is no longer needed for business or legal compliance purposes?</b>	<p><input type="checkbox"/> <b>XX</b> Yes</p> <p><input type="checkbox"/> No</p> <p>Please provide a copy.  <b>See IS Program Document in Whistic Profile</b></p>
<b>18. Have you experienced any security breaches or unauthorized accesses of Personal Information in the past three years?</b>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> <b>XX</b> No</p> <p>Please describe each security breach or unauthorized access.</p>
<b>19. Do you have a disaster recovery plan?</b>	<p><input type="checkbox"/> <b>XX</b> Yes</p> <p><input type="checkbox"/> No</p> <p>Please provide copies of relevant documents.  <b>See Whistic Profile</b></p>



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20. Do you adhere to any technology security standards (e.g., ISO 27002/17799)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe and provide relevant documentation. <b>See IS Program Document in Whistic Profile</b>
Are your information security policies reviewed and, where applicable, updated on a regular basis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe and provide relevant documentation. <b>See IS Program Document in Whistic Profile</b>
21. Do you have a privacy policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide a copy. <b>Spreadly's Privacy Policy is available here: <a href="https://www.spreadly.com/privacy">https://www.spreadly.com/privacy</a></b>
22. Describe the manner in which you regularly identify and assess the risks to <i>Personal Information</i> in your operations?	<b>See IS Program Document in Whistic Profile</b> _____ _____ _____
23. Do you have a security incident response policy/plan?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide a copy. <b>See Whistic Profile</b>
24. Do you have a security incident response team?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
25. Do you have insurance coverage for information security incidents?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide copies of relevant documents. <b>See Whistic Profile</b>

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Questions	Response
26. Do you conduct background screening of employees and contractors who have access to BMW Personal Information?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No Please check all that apply: <input type="checkbox"/> <b>XX</b> Criminal background checks (e.g., national federal criminal database check, county of residence criminal conviction search, terrorist watch lists, etc.) <input type="checkbox"/> Address verification <input type="checkbox"/> <b>XX</b> Education verification <input type="checkbox"/> Credit and financial history <input type="checkbox"/> search <b>XX</b> Employment history <input type="checkbox"/> verification Personal references verification <input type="checkbox"/> Drug screening <input type="checkbox"/> Alcohol screening <input type="checkbox"/> Controlled substances <input type="checkbox"/> screening Other  Please specify: _____
27. Do you require new employees and contractors to sign confidentiality and data security agreements?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No Please provide copies of the relevant forms. <b>See Whistic Profile</b>
28. Do you train relevant personnel on handling Personal Information?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No Please provide copies of the relevant training materials <b>See Whistic Profile.</b>
29. Do you have a policy on the acceptable use of computer systems?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No Please provide a copy. <b>See Whistic Profile</b>
30. Do you have a policy for disciplining personnel for violating your privacy and data security policies and procedures?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No Please provide a copy. <b>See Whistic Profile</b>
31. Do you conduct regular, independent security audits (e.g., SAS 70 Type 2 audits)?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No If you checked "yes," please describe the audit process and frequency, and provide the most recent audit report. <b>See Whistic Profile</b>

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32. Will you use subcontractors to provide services to BMW that may involve access to <b>BMW Personal Information</b> ?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No <p>If yes, describe (i) what services will be provided by the subcontractors, (ii) the names of the subcontractors, and (iii) the country where the services will be performed. <b>See list here: <a href="https://www.spreadly.com/gdpr-subprocessors">https://www.spreadly.com/gdpr-subprocessors</a></b></p> <p>Have you audited or reviewed the subcontractors' privacy and information security governance, policies, practices, and processes, as well as their administrative,</p> <input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No <p>processes, as well as adequate administrative, physical, and technical safeguards for personal information, in the same manner as set-out in this checklist??</p> <input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No
33. Do you have a policy to limit access to <b>Personal Information</b> to need-to-know employees and contractors?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No <p>Please provide a copy.  <b>See Whistic Profile</b></p>
34. Do you have a policy on the regular review of access permissions to <b>Personal Information</b> to ensure that only need-to-know employees and contractors have access?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No <p>Please provide a copy.  <b>See Whistic Profile</b></p>
35. Do you have a procedure for promptly preventing terminated employees and contractors from accessing <b>Personal Information</b> ?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No <p>Please provide a copy  <b>See Whistic Profile.</b></p>
36. Do you regularly test and monitor key administrative, technical and physical controls, systems and procedures for protecting the confidentiality and security of <b>Personal Information</b> ?	<input type="checkbox"/> <b>XX</b> Yes <input type="checkbox"/> No <p>Please provide copies of relevant policies and procedures  <b>See Whistic Profile.</b></p>

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Questions	Response
37. Do you have a policy on change management and change control for your information technology systems?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide a copy. <b>See Whistic Profile</b>
38. Do you inventory all computers, laptops, flash drives and other mobile storage devices that may be used to access or store BMW Personal Information?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide copies of relevant policies and procedures. <b>See Whistic Profile</b>
39. Do you instruct your employees and contractors to limit the storage of Personal Information on mobile storage devices to the minimum required for business purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide copies of relevant policies and procedures <b>See Whistic Profile.</b>
40. Do you have a policy requiring that Personal Information may be stored on mobile storage devices only in encrypted form?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide a copy. <b>See Whistic Profile</b>
41. Do you require the use of security tokens or unique user IDs and strong passwords to access Personal Information?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please provide copies of relevant policies and procedures <b>See Whistic Profile.</b>
How often are users required to change their passwords? <b>Annually</b>	
42. Do you require the use of password-activated screen savers on your computers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
43. Do you use automatic log-off features on your computers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
44. Do you have a policy to limit remote access to your systems that contain Personal Information?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe how remote access is limited and provide copies of relevant policies or procedures. <b>Speedly utilizes role based access control (RBAC) to manage access to limit remote access to systems with Personal Information.</b> <b>Speedly does not share internal policy documents externally with the exception of our PCI and SOC2 auditors. RBAC is reviewed during these audits and Speedly is fully compliant.</b>

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Questions	Response
45. Do you employ wireless networks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please describe how wireless networks are secured, including what protocol is used (e.g. WEP, WEP2, WPA etc.), and provide copies of relevant policies and procedures.</p>
46a. Do you use anti-virus, anti-spyware scanning and intrusion detection software?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please (i) describe the software used and (ii) whether and how the software is kept current, and provide copies of relevant policies and procedures.  <b>See Whistic Profile</b></p>
46b. Do you have automated tools that continuously monitor to ensure malicious software is not deployed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please (i) describe the tools used and (ii) whether and how the tools are kept current, and provide copies of relevant policies and procedures.  <b>See Whistic Profile</b></p>
47a. Do you regularly check for and install software patches on all of your computers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please provide copies of relevant policies or procedures.</p>
47b. Do you use firewalls to protect your systems that may contain <i>Personal Information</i> ?	<p><b>See Whistic Profile - IS Program Document</b></p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please describe and provide copies of relevant policies and procedures.  <b>See Whistic Profile - IS Program Document</b></p>
48. Do you encrypt <i>Personal Information</i> in transmission or storage?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please describe when encryption is used, indicate what type and strength of encryption is used, and provide copies of relevant policies and procedures. <b>See Whistic Profile - IS Program Document</b></p>
49. Do you use wiping software to remove <i>Personal Information</i> from desktops and mobile storage devices when the information is no longer needed for business or legal compliance purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please describe when wiping software is used and provide copies of relevant policies and procedures.  <b>See Whistic Profile - IS Program Document</b></p>

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50. Do you maintain network activity logs and monitor the network for unauthorized access to <i>Personal Information</i> ?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe the monitoring and provide copies of relevant policies and procedures. <b>See Whistic Profile - IS Program Document</b>
51. Do you store any back-up or archival media, workstations or network equipment that may be used to access <i>Personal Information</i> in physically-secure areas?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe how the hardware is stored and provide copies of relevant policies and procedures.
52. Please specify physical measures that you use to control access to your information technology hardware, rooms, files and other areas that may contain <i>Personal Information</i> ?	Please check all security measures that apply to the storage of any media (e.g., hard copies, desktops, laptops, servers, etc.) that may contain <i>Personal Information</i> : <b>Spreedly uses AWS who uses all of the methods listed below.</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Escort-only facility entry for visitors</li> <li><input type="checkbox"/> Locked rooms</li> <li><input type="checkbox"/> Locked cabinets</li> <li><input type="checkbox"/> RFID badge-reading systems</li> <li><input type="checkbox"/> RFID key fobs</li> <li><input type="checkbox"/> Biometric identification</li> <li><input type="checkbox"/> systems Video surveillance</li> <li><input type="checkbox"/> systems Alarms</li> <li><input type="checkbox"/> Security guards</li> <li><input type="checkbox"/> Other measures</li> </ul> Please specify: _____
53. Do you have policies and procedures with respect to requests you receive for access to <i>Personal Information</i> ?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe and provide relevant documentation. <b>See Whistic Profile - IS Program Document</b>
54. Do you have policies and procedures with respect to inquiries you receive regarding <i>Personal Information</i> ?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe and provide relevant documentation. <b>See Whistic Profile - IS Program Document</b>
55. Do you have policies and procedures with respect to complaints you receive regarding <i>Personal Information</i> ?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe and provide relevant documentation <b>See Whistic Profile - IS Program Document.</b>

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56. Do you have policies and procedures with respect to segmenting and separating development, test, and operational facilities (e.g. software, servers, test data etc.)?	<div><input type="checkbox"/> Yes</div> <div><input checked="" type="checkbox"/> No</div> <div>Please describe and provide relevant documentation.</div> <div>Spreadly's development and production environments are logically and physically separate.</div> <div>Spreadly does not share internal policy documents externally with the exception of our PCI and SOC2 auditors. This is reviewed during these audits and Spreadly is fully compliant.</div>
57. Have you completed an independent third-party assurance audits (CSAE 3416 / SSAE 16)?	<div><input type="checkbox"/> Yes</div> <div><input checked="" type="checkbox"/> No</div> <div>Please provide copies of relevant documentation.</div> <div>Spreadly is audited against PCI DSS and SOC 2</div>
58. Canada's Anti-Spam Legislation (CASL) establishes rules for sending commercial electronic messages (CEMs). CASL applies to all electronic messages (i.e. email, texts) organizations send in connection with a "commercial activity" within, from or to Canada. Will your organization be responsible for sending CEMs to recipients on behalf of BMW Canada Inc.?	<div><input type="checkbox"/> Yes</div> <div><input checked="" type="checkbox"/> No</div> <div>If yes, please provide the primary CASL contacts within your organization who would be responsible for CASL enquires.</div> <div>Name: <input type="text"/></div> <div>Title: <input type="text"/></div> <div>Address: <input type="text"/></div> <div><input type="text"/></div> <div><input type="text"/></div> <div>E-mail: <input type="text"/></div> <div>Phone: <input type="text"/></div>
59a. Does your organization have a breach response plan and record keeping program in compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA) mandatory reporting of breaches of security?	<div><input type="checkbox"/> Yes</div> <div><input checked="" type="checkbox"/> No</div> <div>Please describe and provide copies of relevant documentation</div> <div>See Whistic Profile</div>

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<p>59b. Does your organization have a deputy for handling information security and privacy related breaches and/ or a breach response team?</p>	<div><input type="checkbox"/> Yes</div> <div><input checked="" type="checkbox"/> No</div> <p>If yes, please provide the primary contacts within your organization who would be responsible for security breach related enquiries.</p> <p>Name: _____Jennifer Rosario_____</p> <p>Title: _____CISO_____</p> <p>Address: _____300 Morris Street, Suite 400_____</p> <p>_____Durham NC 27701_____</p> <p>_____</p> <p>E-mail: _____jirrosario@spreedly.com_____</p> <p>Phone: _____888-727-7750_____</p>
<p>59c. Does your organization comply with all applicable laws governing the processing of personal information, including the federal Personal Information Protection and Electronic Documents Act ("PIPEDA") and substantially similar provincial laws in Alberta, British Columbia and Quebec?</p>	<div><input type="checkbox"/> Yes</div> <div><input checked="" type="checkbox"/> No</div> <p>Please describe and provide copies of relevant documentation.</p> <p>See Whistic Profile</p>



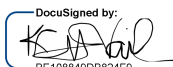
## BMW Service Provider Checklist - July

<p><b>60. Is your organization required to comply with the Accessibility for Ontarians with Disabilities Act (AODA) or any other similar laws relating to accessibility?</b></p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No         </p> <p>If your organization is required to comply with AODA, please confirm:</p> <p>1. Your organization is fully compliant with the expectations outlined in AODA and with respect to your organization website(s) and web content accessibility requirements as per WCAG 2.0 Level AA compliance metrics.</p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No         </p> <p>Please describe and provide any relevant information/documentation.</p>
<p><b>61. Is your organization required to be compliant with Canada's Modern Slavery Act, the act implemented to fight against Forced Labour and Child Labour in Supply Chains Act &amp; the Customs Tariff?</b></p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No         </p> <p>If yes, has your organization filed the required yearly report with the Minister of Public Safety and Emergency Preparedness on or before May 31 of each year?</p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No         </p> <p>If yes, please provide the URL link to the most recent filed report. URL Link:</p> <p>Please describe and provide any relevant information/documentation.</p>
<p><b>62. Is your organization fully compliant with Quebec's Law 25 regulation respecting personal data protection.</b></p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No         </p> <p>Please describe and provide copies of relevant documentation. <b>Spreadly is compliant with GDPR which is a comparable Data Privacy Regulation.</b></p>

The undersigned hereby represents and warrants that the policies and procedures described herein are

## BMW Service Provider Checklist - July

valid and in effect and are carried out as disclosed and described.

DocuSigned by:  
  
BE108849DB824F9

Name: Nellie Vail

Title: CFO

Date: 4/3/2025

*I have authority to bind the Corporation*

Signed by:  
  
09CEE8DBBF04498...

Name: Rachel Fine

Title: Senior Compliance Manager II

Date: 4/3/2025

*I have authority to bind the Corporation*