

CalcuQuote Technology Control Plan

I. SCOPE

The procedures contained in this plan apply to all elements of Sutaria Services Inc dba CalcuQuote, 414 Englewood Drive, Murphy, TX. Disclosure of classified information to foreign persons in a visitor status is considered an export disclosure under the International Traffic in Arms Regulations (ITAR) and requires an authorization from either the State Department or the Commerce Department.

II. PURPOSE

To delineate and inform employees and visitors of CalcuQuote the controls necessary to ensure that no transfer of classified defense information or controlled unclassified information (defined as technical information or data or a defense service as defined in ITAR paragraphs 120.9 & 120.10) occurs unless authorized State Department or the Commerce Department.

III. BACKGROUND

CalcuQuote develops technology for various industries that may have access to ITAR controlled information, including electronics manufacturing services industry and its supply chains.

IV. US PERSON/FOREIGN PERSON

The NISPOM defines a U.S. person as any form of business enterprise or entity organized, chartered or incorporated under the laws of the United States or its possessions and trust territories, and any person who is a citizen or national of the United States.

A U.S. National is defined in the NISPOM as a citizen of the U.S., or a person who, though not a citizen of the U.S., owes permanent allegiance to the U.S.. Also see 8 USC 1101(a) (22) or 8 USC 1401 (a) para 1 to 7 for further clarification on those who may qualify as nationals of the United States.

A Foreign National is any person who is not a citizen or national of the United States. A Foreign Person is defined as any foreign interest, and any U.S. person effectively controlled by a foreign interest. A Foreign Interest is any foreign government, agency of a foreign government, or representative of a foreign government; any form of business enterprise or legal entity organized, chartered or incorporated under the laws of any country other than the U.S. or its possessions and trust territories, and any person who is not a citizen or national of the United States.

A. Foreign Persons

- 1) No foreign person will be given access to classified material or controlled unclassified information on any project or program that involves the disclosure of technical data as defined in ITAR paragraph 120.10 until that individual's license authority has been approved.

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2) CalcuQuote employees who have supervisory responsibilities for foreign persons must receive an export control/licensing briefing that addresses relevant ITAR requirements as they pertain to classified and controlled unclassified information.

B. Foreign Person Indoctrination

Foreign persons employed by, assigned to (extended visit) or visiting CalcuQuote, shall receive a briefing that addresses the following items:

- a) that prior to the release of classified material or controlled unclassified information to a foreign person an export authorization needs to be obtained by CalcuQuote.
- b) that they adhered to the CalcuQuote's security rules, policies and procedures and in-plant personnel regulations.
- c) that outlines the specific information that has been authorized for release to them.
- d) that addresses CalcuQuote 's in-plant regulations for the use of facsimile, automated information systems and reproduction machines.
- e) that any classified information they are authorized to have access and need to forward overseas will be submitted to CalcuQuote's security department for transmission through government-to-government channels.
- f) that information received at CalcuQuote for the foreign national and information that the foreign national needs to forward from CalcuQuote shall be prepared in English.

V. ACCESS CONTROLS FOR FOREIGN NATIONALS

Address how foreign nationals will be controlled within the company's premises, for example:

- 1) ITAR databases are stored in the Azure Government Cloud
 - a) Select foreign nationals are provided with restricted access for specific use cases through account provisioning process
 - b) Foreign nationals have access to the database with limited control
 - c) ITAR controlled fields are masked for Foreign nationals
- 2) ITAR identified documents are stored in the Azure Government Cloud and the AWS GovCloud
 - a) AWS Government Cloud is only accessible by US Nationals

VI. EXPORT CONTROLLED INFORMATION

List specific elements of export controlled information, both classified and unclassified, that can be disclosed to foreign nationals and the program(s) the foreign national is supporting

VII. NON-DISCLOSURE STATEMENT AND ACKNOWLEDGMENT

All foreign persons shall sign a non-disclosure statement that acknowledges that classified and controlled unclassified information will not be further disclosed, exported or transmitted by the individual to any

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foreign national or foreign country unless ODTA authorizes such a disclosure and the receiving party is appropriately cleared in accordance with its government's personnel security system. CalcuQuote can deem specific information as proprietary or unclassified information that does not require an export authorization but which the contract the information pertains calls for specific handling procedures.

VIII. SUPERVISORY RESPONSIBILITIES

Supervisors of cleared personnel and foreign national employees and foreign national visitors shall ensure that the employees and visitors are informed of and cognizant of the following:

- 1) that technical data or defense services that require an export authorization is not transmitted, shipped, mailed, hand carried (or any other means of transmission) unless an export authorization has already been obtained by CalcuQuote and the transmission procedures follows U. S. Government regulations.
- 2) that individuals are cognizant of all regulations concerning the handling and safeguarding of classified information, proprietary and controlled unclassified information.
- 3) that the individuals review a technology control plan (TCP) and acknowledge that they have received a copy of the TCP and were briefed on the contents of the plan.
- 4) that U.S. citizen employees are knowledgeable of the information that can be disclosed or accessed by foreign nationals

Employee Acknowledgment:

Name

Signature

Date.