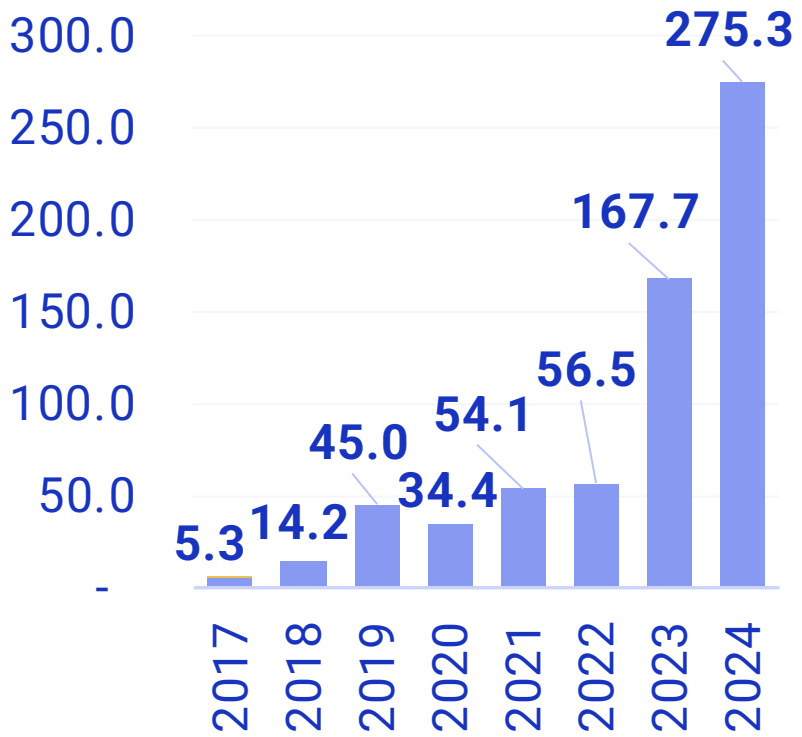
Clearwater Capabilities Overview

Clearwater

Threats to Healthcare Continue to Grow

Breaches in healthcare continue to break records, and ransomware attacks are increasing, are more damaging and are taking longer to recover from.

Millions of Healthcare Records Breached[1]



Healthcare organizations report a ransomware attack last 12 months[2]

2023	2024
60%	67%

> than 1 week to recover

2023	2024
50%	79%

Why are breaches increasing in healthcare and becoming harder to recover from?

- Growing attack surface with more vulnerabilities
- ePHI is most valuable data
- Most likely to pay ransom
- Number of attackers increasing
- TTPs are evolving quickly
- Weak security programs
- Limited resources

Clearwater

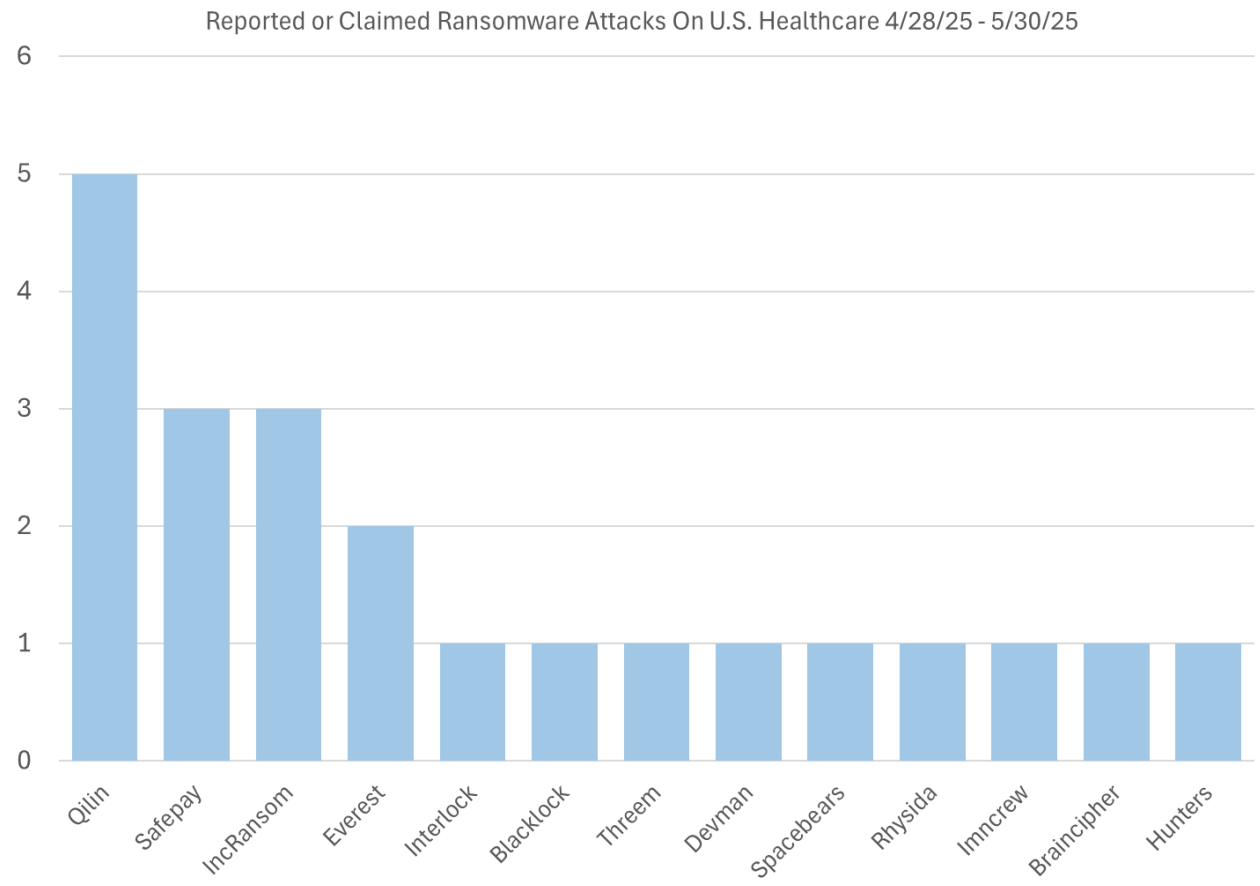
1 The HHS Breach Portal (2024 data through 12/31/24, pulled on 1/31/25; 2023 data pulled 11/3/24) + 90 million additional records Change Healthcare announced earlier this year

2 The State of Ransomware in Healthcare 2024 – Sophos News

UPDATE SLIDE MONTHLY FROM CYBER BRIEFING

Ransomware Attacks on Healthcare are Increasing

22 newly identified ransomware attacks on U.S. Healthcare organizations 4/28/25 – 5/30/25.*



- Majority of attacks continue to occur on specialty provider groups, ambulatory surgical centers, physician practices, behavioral health and assisted living facilities
- Qilin had more reported attacks than any other threat actor in healthcare
  - Attacks on Clinpath (labs), The Holiday (SNF), New Season (Rehab), Dermatologists of Birmingham, and LaTouche Pediatrics
- IncRansom continues to be a front-runner
- SafePay moved to top 3 attackers after no activity last month

Clearwater

*Source: Ransomware.live - Last ransom claims or publicly reported but not yet leaked

Healthcare Organizations Are Feeling the Pain

89%

Of OCR ePHI-related enforcement actions found failure to conduct risk analysis.

67%

Of surveyed healthcare organizations reported ransomware incident in 2024, a four-year high up from 60% in 2023.

389

U.S. institutions reported ransomware attacks in 2024 resulting in delays in medical procedures and disruptions to patient care.

UPDATE SLIDE MONTHLY FROM CYBER BRIEFING

OCR Enforcement is Increasing

HHS OCR has been active with several new settlements and appointing of new Director.

Paula M. Stannard announced as Director of HHS Office for Civil Rights

- Previous experience at HHS in legal affairs under first Trump and George W. Bush administrations
- Replaces Alex Azar who was in interim role

HHS Announces Paula M. Stannard as Director of the Office for Civil Rights | HHS.gov

Enforcement Actions Since Last Cyber Briefing, Both with 2 Year Corrective Action Plans

- BayCare Health System: 16 hospitals, malicious insider, 586K individuals - 5/28/25 - $75,000
- Comstar: medical billing and collection company, ransomware, single complainant 5/30/25 - $800,000

Risk Analysis, Risk Management Plans, and Review of System Activity continue to be top areas of focus for OCR Enforcement.

Link to OCR's Final Guidance on Risk Analysis

Link to Differences Between HIPAA Security Evaluations and Risk Analysis - Clearwater

Threat Environment Creates Challenging Demands

Cybersecurity & Compliance Demands

- A cybersecurity program with recognized best practices
- Comprehensive understanding of current risk and maturity
- Optimized security investment decisions
- Compliance with regulations, insurance and customer/third party requirements
- Resiliency – the ability to effectively detect, respond, operate during, and recover from a security incident

Challenges in Meeting Demands

- Limited compliance and security resources, expertise and capabilities
- Staff turnover creates gaps, or restarts to program
- Lack of visibility to risks
- Increasing cyber insurance costs and underwriter demands
- Cybersecurity and compliance interfere with core activities that drive strategic value

Moving healthcare organizations to a more secure, compliant, and resilient state so they can achieve their missions.

Clearwater Overview

- Founded in 2009, the largest pureplay healthcare cybersecurity and compliance managed services and consulting firm
- 600+ clients including large IDNs, academic medical centers, ambulatory providers, and digital health companies
- 200 colleagues with 100+ expert on-shore consultants
- 24x7x365 Security Operations Center with Managed Detection & Response (MDR) Services and Managed Azure Cloud Services
- Proprietary IRM|Pro® SaaS-based software platform for analyzing and managing cybersecurity and compliance risks
- 100% OCR acceptance rate of our deliverables

Modern Healthcare 2024 BEST IN BUSINESS

Modern Healthcare's 2024 Best in Business Awards in the Cybersecurity category

BLACK BOOK 2025 UNBIASED SOURCE

Recognized as the #1 Client-Rated Cybersecurity and Compliance Consulting Firm by over 3,000 healthcare IT and Security Leaders

MSSP Alert TOP 250 MSSP 2024 HONOREE

Recognized among the world's top MSSPs in MSSP Alert's latest readership survey

2025 WINNER CYBER SECURITY EXCELLENCE AWARDS

ClearAdvantage Managed Services Program for Regional and Critical Access Hospitals for Healthcare Industry Solution

KLAS SOFTWARE & SERVICES 2025

Won the 2025 KLAS "Most Improved Award" for the largest increase in service levels of an acquired service line.

CYBERSECURITY BREAKTHROUGH AWARD 2024

"Redspin ready" CMMC Cloud Hosting solution is the winner of the "Critical Infrastructure Cybersecurity Solution of the Year"

Clearwater

Our C.L.E.A.R Values

Commitment to Client Success
- Educate, advise and assist the industries we serve
- Understand our client needs and exceed their expectations

Lead with Accountability, Integrity & Collaboration
- Be accountable to one another and take responsibility as a team
- Empower colleagues to take action

Excellence in All That We Do
- Deliver superior and innovative solutions of the highest quality
- Drive highest levels of operational performance

Advance Colleague Success
- Foster mentorship, coaching and recognition of achievement
- Enable career growth, professional development, and inclusivity

Respect & Transparency
- Listen with intent; value individuality and diverse backgrounds
- Be honest, open, and collaborative

Clearwater

Service Leaders With Deep Healthcare Experience

STEVE AKERS

Chief information Security Officer and Chief Technology Officer, Managed Security Services

JON MOORE
JD, MS, HCISPP

Chief Risk Officer; SVP Consulting Services

DAVE BAILEY
EMBA, CISSP

Vice President, Security & Resiliency Services

ANDREW MAHLER
JD, CIPP/US, CHC, CHPC, CHRC

Vice President, Privacy & Compliance Services

ALAN GUSH

Vice President, Technical Security Services

JACKIE MATTINGLY
CHPS, HCISPP, CHISL, CISSP

Senior Director, Consulting Services Small & Medium Hospitals

TRAPPER BROWN
CASP

Director, Consulting Services IDN/Hospital

MICHAEL CURATOLO
CISSP, CRISC, CEH

Director, Consulting Services IDN/Hospital

JAIME CIFUENTES
CISSP, C|CISO

Director, Consulting Services PPMG & Ambulatory

HAL PORTER
CISSP, CCSP, Security+, CE

Director, Consulting Services Digital Health & Health IT

Clearwater

Trusted Expert Partner to Healthcare

Awards & Recognition

Recipient of Modern Healthcare's 2024 Best in Business Awards in the Cybersecurity category

Recognized as the #1 Client-Rated Cybersecurity and Compliance Consulting Firm in the Top 100 Healthcare IT Advisory and Consulting Project Areas in Highest Demand for 2025

Voted #1 Healthcare Cybersecurity Consultant by over 3,000 healthcare IT and Security Leaders in 2024

Recognized among the world's top MSSPs in MSSP Alert's latest readership survey

1. The ClearAdvantage Managed Services Program for Regional and Critical Access Hospitals for Healthcare Industry Solution
2. Redspin's CMMC Services in the CMMC Compliance category
3. The Redspin Ready Managed Cloud Programs in the National Cyber Defense category

Won the 2025 KLAS Most Improved Award" for the largest increase in service levels (related to an acquired service line)

100+ Experienced and Certified Consultants

- A+
- BCMS (ISO22031)
- C|CISO
- C|EH
- C|ND
- CAHIMS
- CARTP
- CASP
- CBCP
- CCA
- CCNA
- CCNP
- CCP
- CCSFP
- CCSFP
- CCSK
- CCSP
- CDH-L
- CDPSE
- CE
- CEH
- CGEIT
- CHC
- CHISL
- CHPC
- CHPCP
- CHPS
- CHQP
- CIPM
- CIPP/US
- CISA
- CISM
- CISSP
- CP
- CPA
- CPHQ
- CPTS
- CRISC
- CRTO
- CySA+
- GCIH
- GISP
- GPEN
- GREM
- GWAPT
- GWEB
- GXPN
- HCISPP
- ISO/IEC 27001
- ITIL
- IVMCA
- JD
- LSSGB
- MBA
- MCCAE
- MCSOA
- MPA
- MS
- MS, IPM
- MSCHPM
- MSHSA
- Network+
- OSCE
- OSCP
- OSEE
- OSEP
- PCI AQSA
- Ph.D.
- PJPT
- PMP
- RHIA
- RN
- SAA-C03
- Sec+

Clearwater

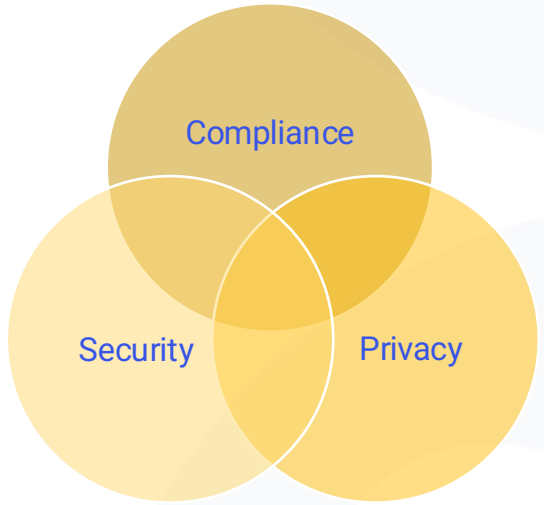
The Most Comprehensive Set of Cybersecurity & Compliance Services for Healthcare Organizations

We combine people, processes, and technology to deliver better, easier, and more cost-effective solutions to business problems, and enable our clients to achieve their strategic goals and objectives.

Cybersecurity Program Leadership & Execution	Risk Analysis & Risk Management	Compliance & Privacy	Audit & Certification (HITRUST, PCI, SOC 2)
Managed Security Services / SOC	Technical Testing & Engineering Services	Incident Response & Resiliency Services	Azure Managed Cloud Services

Delivered as Multi-Year Managed Services Programs to Drive Value

We are experts in Healthcare Sector Sub-Segment Specific Needs



Dedicated Practice Groups for Digital Health/ HIT, IDNs/Health Systems Small Hospitals, Ambulatory/PPMG

Clearwater

Extensive Experience in the Hospital and Health System Sector

Extensive Experience In Digital Health, PPMG & Other Healthcare

Physician Practices / Specialty Providers

PRIVIA HEALTH
Hospitalist GROUP
Gen4 DENTAL PARTNERS
United Vein & VASCULAR CENTERS
ClinicalCare Medical Centers
LYNC HEALTH PARTNERS
RockDental BRANDS
Hazelden Betty Ford Foundation
CASCADE Eye & Skin Centers, P.C.
inception
VITAS Healthcare
OrthoVirginia
dermcare MANAGEMENT
Elevate ENT PARTNERS

Health IT / Digital Health

ELLIGO HEALTH RESEARCH
foresee MEDICAL
Lyric
DOCOVIA
Tegria
Bonafide the #1 ERP for DME
Ludi
surescripts
ATELCOR
podimetrics
within
25m health

Other

SAP
CMP PHARMA
CHARLES J. HILTON & ASSOCIATES, P.C. Attorneys at Law
FUJIFILM
The Society of Thoracic Surgeons
RevSpring
Florida Health Care Plans
TRIPLE-S

Clearwater

Education & Thought Leadership

Clearwater has a long history of providing free education to the healthcare cybersecurity and HIPAA community.

Clearwater's Monthly Cyber Briefing | 12pm – 1pm CT

We invite you to attend our free, virtual monthly Cyber Briefing. During each hour-long, dynamic, educational session an industry expert will draw on their previous experience to cover several key topics & trending news related to healthcare privacy, cybersecurity, IT audit, & compliance.

Register Now ›

The 405(d) Advantage: What Healthcare Leaders Should Know | July 18 @ 1:00 CST

There's a treasure trove of free cybersecurity resources available from HHS to healthcare leaders—here's how to ...

Register Now ›

AMERICAN HEALTH LAW ASSOCIATION

■ Podcast

(AHLA) Understanding Privacy and Security Regulations in the Exploding Wellness Apps Market

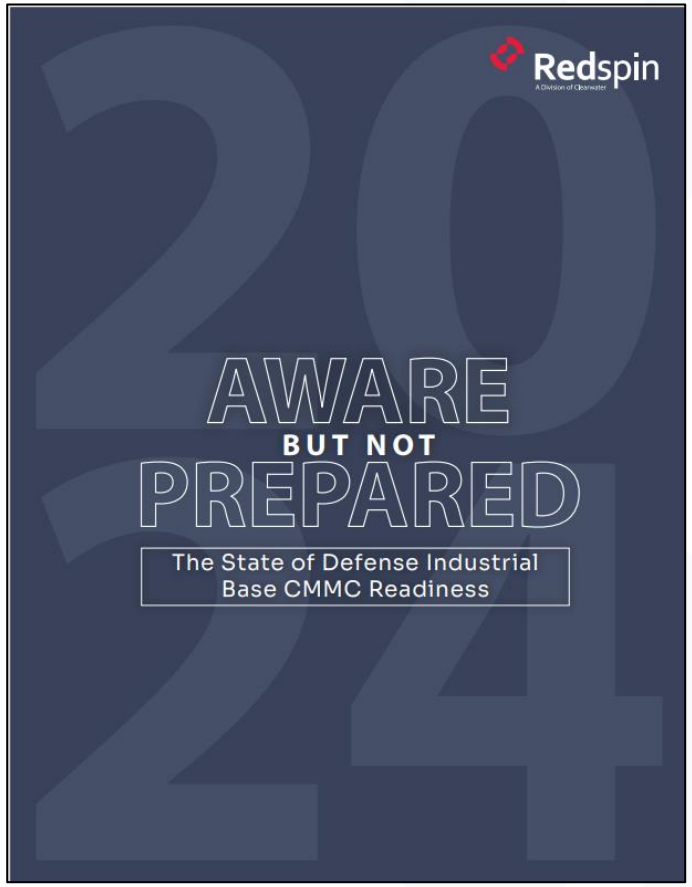
Listen Now

■ Podcast

Healthcare Defenders: Augie D'Agostino | UW Medicine

Listen Now

Data-Driven, Industry-Leading Insights



Why Healthcare Organizations Partner With Clearwater

People & Expertise	Highly skilled team of 100+ consultants with deep insight across healthcare
Reputation & Trust	Recognized leader in our markets with strong KLAS scores, often referred by attorneys and other experts
Strategic Guidance	Advanced support leveraging comprehensive portfolio of healthcare security & compliance services
Tech-Enabled Solutions	Innovative IRM|Pro® software suite and MSS/SOC platform that power our services
White Glove Service	Proactive, flexible, and willing to go above and beyond to meet client needs
Client Outcomes	Outstanding track record of delivering on-going value with 100% of risk analysis accepted by OCR

Strong Client Endorsements From Healthcare Leaders

"Partnering with Clearwater has been a critical step in bringing our solution to market. Their team of experts guided us in building our cloud architecture in alignment with industry standard protocols and maintaining the necessary audit trail for HIPAA purposes. And they play an ongoing role in ensuring our cloud-based applications meet our customers' strict security and availability requirements"

Chaitanya Mamillapalli, MD, MRCP, FAPCR, FACE, CEO

CARE HEALTH

"Clearwater helped us articulate in a very transparent way what we had in place and how we were following the requirements of the HIPAA Security Rule. As a result, the OCR agreed that the corrective action plan wasn't needed."

Terri Ripley, CIO

OrthoVirginia

"As the industry continues to evolve, we recognize the need to advance our approach to cybersecurity and HIPAA compliance. Clearwater is the ideal partner to help us do that. Their ClearAdvantage program provides us with ongoing access to a deep team of cybersecurity and compliance experts that know the healthcare industry inside out, software that is purpose-built to help us manage cyber and compliance risk, and a dedicated program leader to bring it all together in alignment with our business objectives."

Mark Ludwig, CEO

Bonafide the #1 ERP for DME

Clearwater's Core Cybersecurity Advisory, Risk Management & Resiliency Services

Build Cybersecurity Programs Based on Recognized Practices

NIST Cybersecurity Framework

Created through collaboration between industry and government, the voluntary Framework consists of standards, guidelines, and practices to promote the protection of critical infrastructure.

https://www.nist.gov/cyberframework

CSA of 2015 Section 405(d)

The 405(d) aims to raise awareness, provide vetted cybersecurity practices, and move towards consistency in mitigating the current most pertinent cybersecurity threats to the health sector.

HHS 405(d)
Aligning Health Care Industry Security Approaches

https://www.phe.gov/Preparedness/planning/405d/Pages/default.aspx

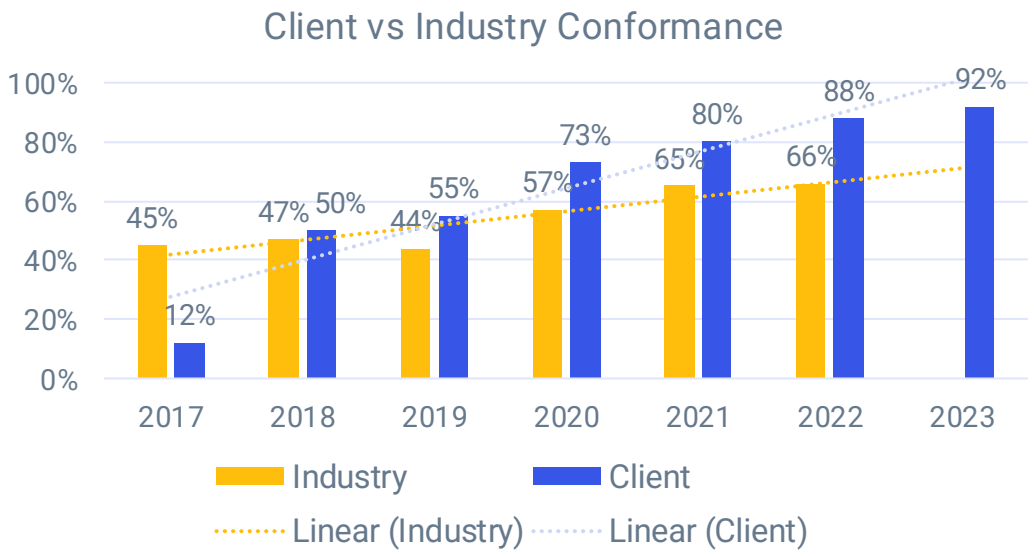
Program Leadership & Transformation

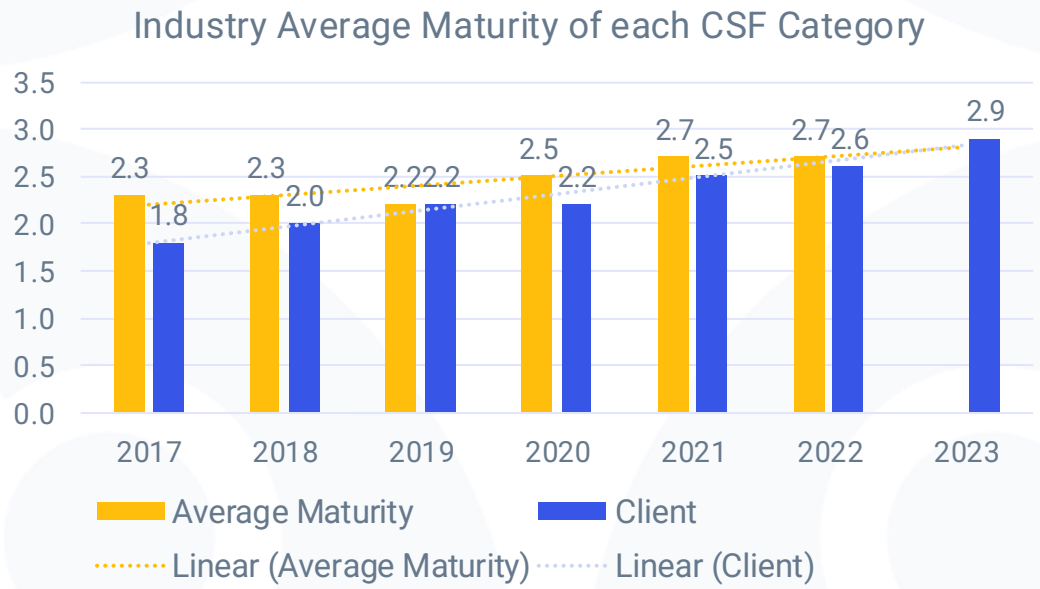
Seasoned cybersecurity leaders with significant experience build standards-based cybersecurity and compliance programs

- vCISO, vCPO, vCCO support
- Security Policies & Procedures
- Strategic & Tactical Planning
- Workforce Training
- Tool Selection & Implementation Planning
- Remediation & Maturity Program Support
- Audit & Certification Readiness (SOC 2, HITRUST, CMMC)
- Diligence and M&A Integration Support

Ongoing Maturity Trending vs. Benchmarks

Our maturity assessment gauges program performance and maturity improvements over time in NIST Cybersecurity Framework categories relative to industry benchmarks.

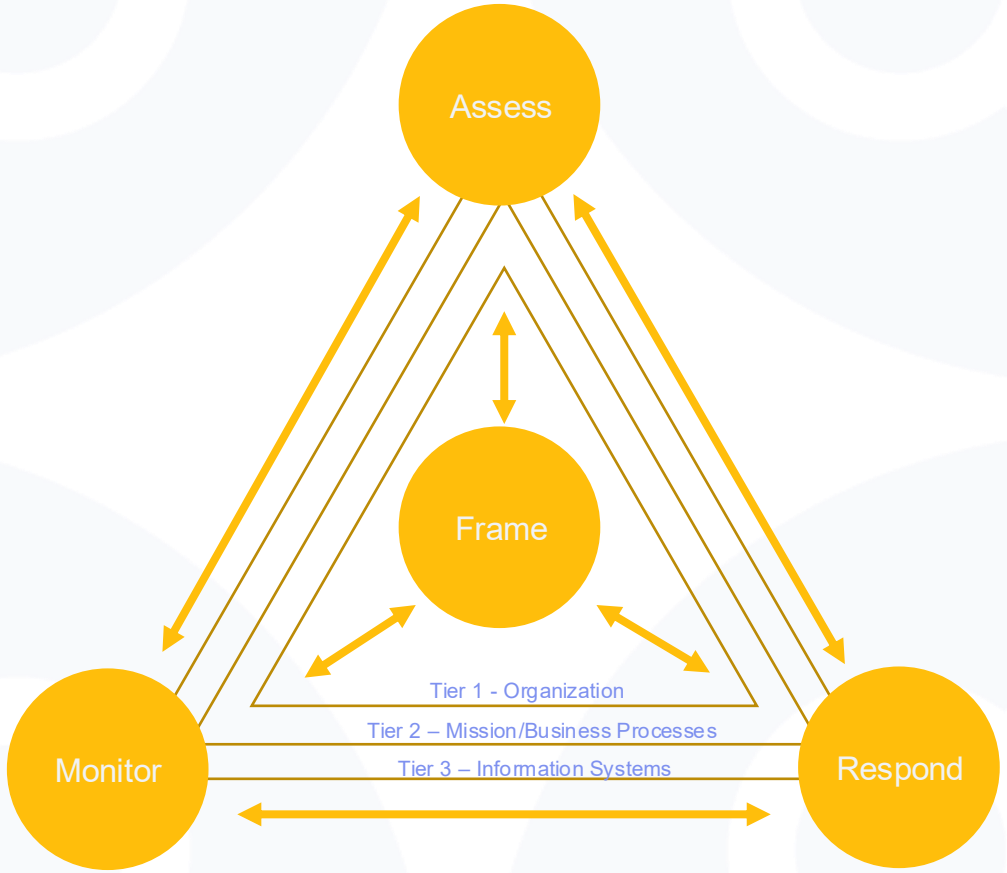




**The above charts are a generic example for reference*

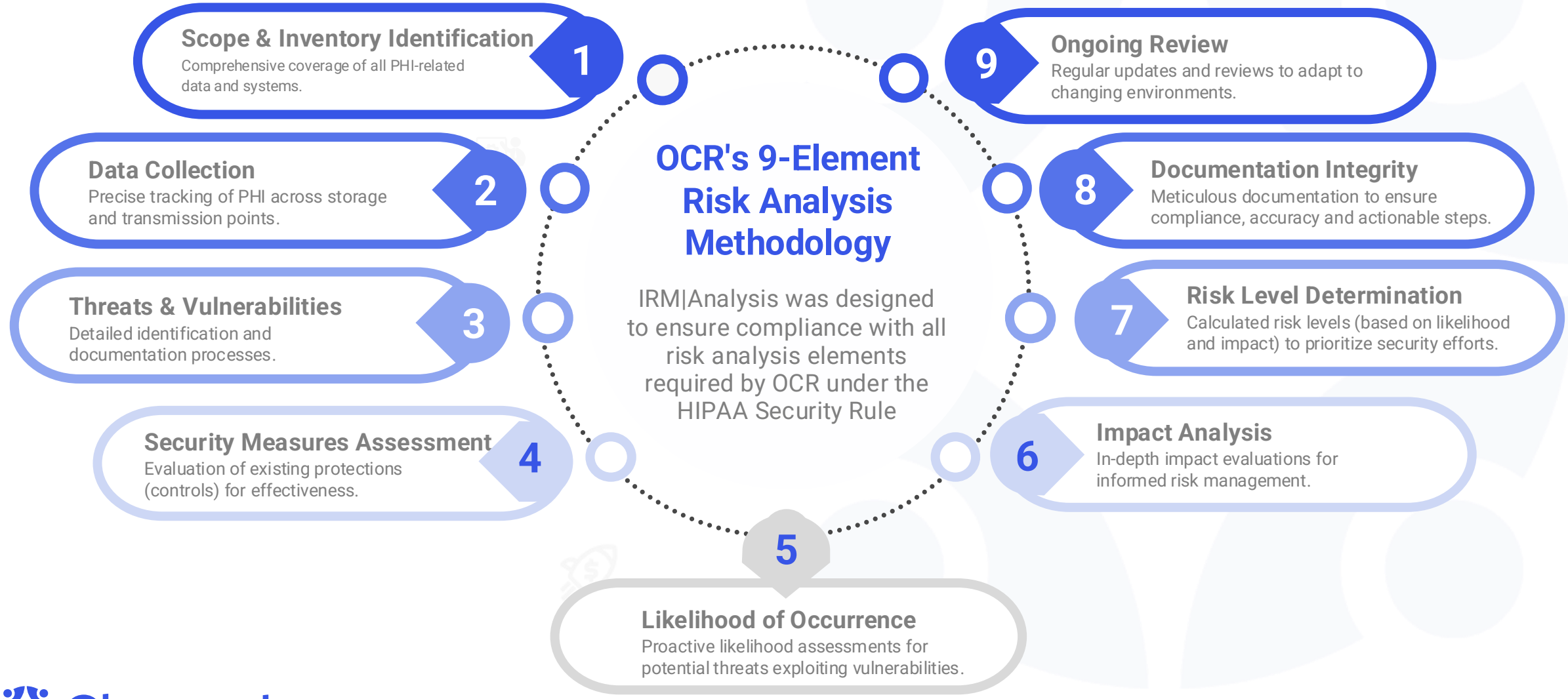
Risk Management - NIST Standards & OCR Experience

- **Clearwater's solutions are built on NIST Guidance and Standards**
  - NIST SP 800-39 Managing Information Security Risk
  - NIST SP 800-30 Guide for Conducting Risk Assessments
  - NIST SP 800-53 rev5 Security and Privacy Controls for Federal Information Systems and Organizations
- **Clearwater's Risk Analysis methodology was purpose built to adhere to HIPAA requirements and Office for Civil Rights (OCR) guidance and enforcement actions**
  - The HIPAA Risk Analysis implementation specification 45 CFR §164.308(a)(1)(ii)(A) of the HIPAA Security Rule;
  - HHS/OCR "Guidance on Risk Analysis Requirements under the HIPAA Security Rule"
  - The "OCR Audit Protocol – Updated April 2018" specific to Risk Analysis and Risk Management
  - Our own work with dozens of organizations subjected to OCR enforcement actions.



NIST Risk Management Process Applied Across Organizational Tiers

Risk Analysis That Meets All 9 Elements of OCR's Guidance



Clearwater

Gold Standard Risk Analysis & Risk Management Solution

OCR cites failure to meet the HIPAA Security Rule's Risk Analysis requirement in ~90% of all HIPPA security rule enforcement actions

Purpose built for healthcare in alignment with OCR's Final Guidance, enforcement actions and commentary. **Our deliverables have achieved a 100% acceptance rate by OCR.**

Rigorous

- Includes all information systems with ePHI and other sensitive data
- Assesses controls and risks at the system and component level
- Follows NIST SP 800-30
- Meets all 9 elements of OCR's Final Guidance on Risk Analysis
- Performed by expert healthcare cyber risk consultants

Industry Proven

- Recommended by the nation's top healthcare security and privacy attorneys including former OCR Directors
- Experience addressing hundreds of HHS Office for Civil Rights (OCR) investigations and Corrective Action Plans
- 100% OCR success rate when clients have submitted Clearwater deliverables

Tech-Enabled

- Intelligent algorithms and Machine Learning-AI support comprehensive analysis
- View critical risks on dashboards and reports, produce OCR-Ready Reports and peer benchmarking
- Initiate risk response and create and track remediation actions
- Fully populated software platform for ongoing risk analysis and management

IRM | Analysis®

"Based on all I've seen over the years, Clearwater's risk analysis methodology and software are in the best-of-breed tier and can be seriously considered by any organization striving to meet regulatory requirements in performing HIPAA Risk Analysis."

Leon Rodriguez, Partner, Seyfarth Shaw and former Director of the Office for Civil Rights

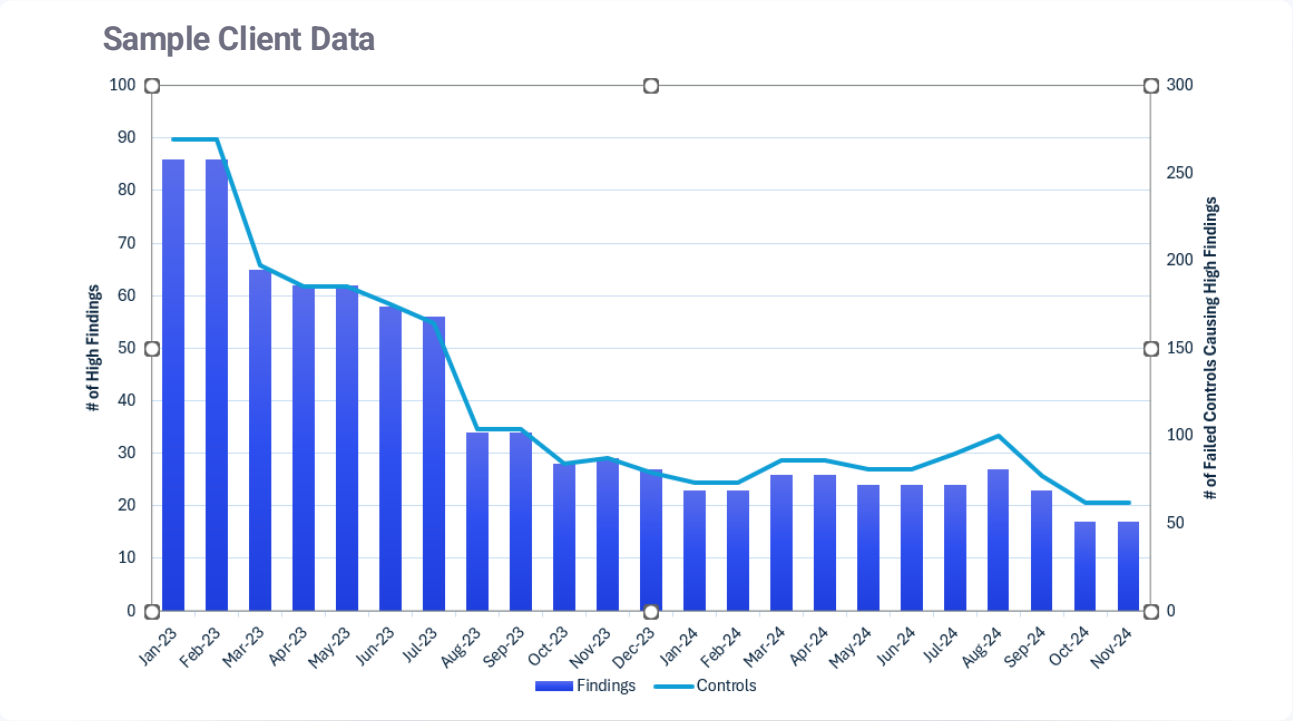
Seyfarth

Clearwater

Various Levels of Risk Response & Remediation Support to Match Your Needs

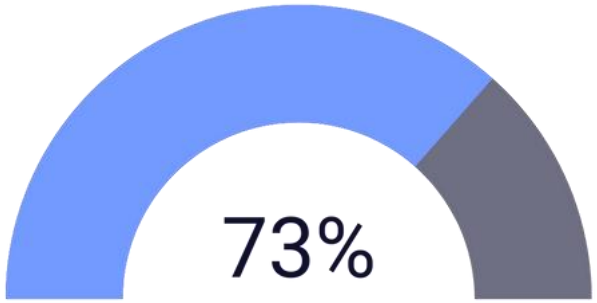
Level	Support Function	Clearwater Included Services
Level 1	Create action plans	• Lead your team in risk treatment decisions and document rationale. • For all risks that are treated with remediation, we present options to risk owners with estimated time, cost, LOE, and feasibility • We create the action plan and document all information in IRM|Analysis
Level 2	Create Action Plans & Manage Implementation	• In addition to Level 1, Clearwater will drive execution of the risk response plan • Clearwater will assist with questions and provide support • Clearwater will follow-up with risk owners about status • Clearwater will document progress and provide status reporting.
Level 3	Create Action Plans, Manage Implementation, Perform Remediation	• In addition to Level 1 and 2, Clearwater will support remediation efforts • Remediation may include revision of policies and procedures, project management of technical controls implementation, or advice with technical configurations • Clearwater does NOT provide “hands on keys” remediation

Clearwater



Proven Risk Reduction Outcomes

In a typical Clearwater services program lifecycle, organizations drive significant risk reduction, achieving measurable improvements in cybersecurity maturity within just a few years.



Progress Year over Year

Across our client base, the average percentage of risks at or above clients' risk threshold dropped by over 73% over the course of a typical 3-year engagement.

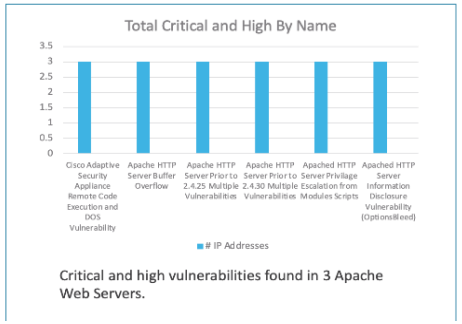
Values generated from a sampling of actual Clearwater client outcomes.

Clearwater

Technical Testing – Offensive Security

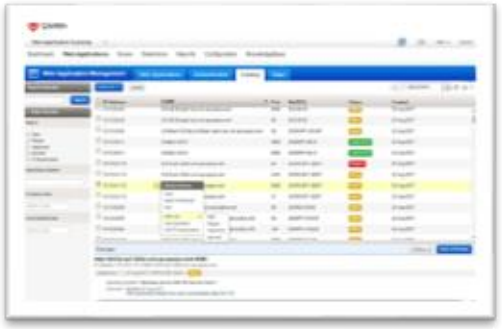
Internal / External Vulnerability Scanning

Identify weaknesses and understand how they can be exploited by malicious actors to gain access to internal information systems and identify vulnerabilities that are exposed to the internet.



Web Application Scanning

Identify vulnerabilities with web applications that, if left unattended, could lead to the compromise of confidentiality, integrity and/or availability (“CIA”).



Internal / External / Wireless Pen Testing

Conduct a series of authorized simulated attacks on your information systems to evaluate the effectiveness of existing security safeguards.

Phishing / Social Engineering Testing

Assess awareness of social engineering tactics by simulating attacks that attempt to exploit the human factor in your risk management program.

Clearwater

Security Engineering, Cloud Security & Remediation

Network Assessment & Design

Apply best practices to secure your network and the resources it contains.

- Review of network diagrams
- Assessment of network security in relation to and best practices
- Development of recommendations
- Guidance on implementation of recommendations

Cloud Assessment & Design

Assist in assessing risk and designing, constructing and operating security in your cloud environments.

- Review of Cloud security architecture
- Identification and guidance on use of best practices in designing, constructing and managing cloud security
- Hardening of cloud infrastructure

Security Engineering, Remediation

Assist in implementation of technical security controls or provide staff augmentation.

- Security tool evaluation, selection
- Support remediation or implementation of security tools
- Staff augmentation for projects or ongoing security activities
- Other project-based work

Clearwater

Application Security

Security in the SDLC

Build security into your applications from the ground up.

- Evaluate security in the system development life cycle
- Design security controls for inclusion in SDLC
- Assist with implementation of security controls in SDLC
- Advise on application of controls during application development
- Conduct penetration testing of application security controls

Web Application & Mobile App Penetration Testing

Identify web application misconfigurations and security weaknesses.

- Conduct tests from the perspective of a regular user or an adversary
- Periodic iOS and Android Mobile Application Penetration Testing
- Identify misconfigurations and vulnerabilities that could be exploited by an attacker.
- Consider overall risk, exploitation likelihood, and potential impact
- Provide prioritized remediation recommendations and advice

Static Application Security Testing

Find and fix source code vulnerabilities.

- Automated scanning of source code.
- Multiple levels of analysis (function, file, application)
- Find OWASP top vulnerabilities
- Advise on application of controls during application development

Clearwater

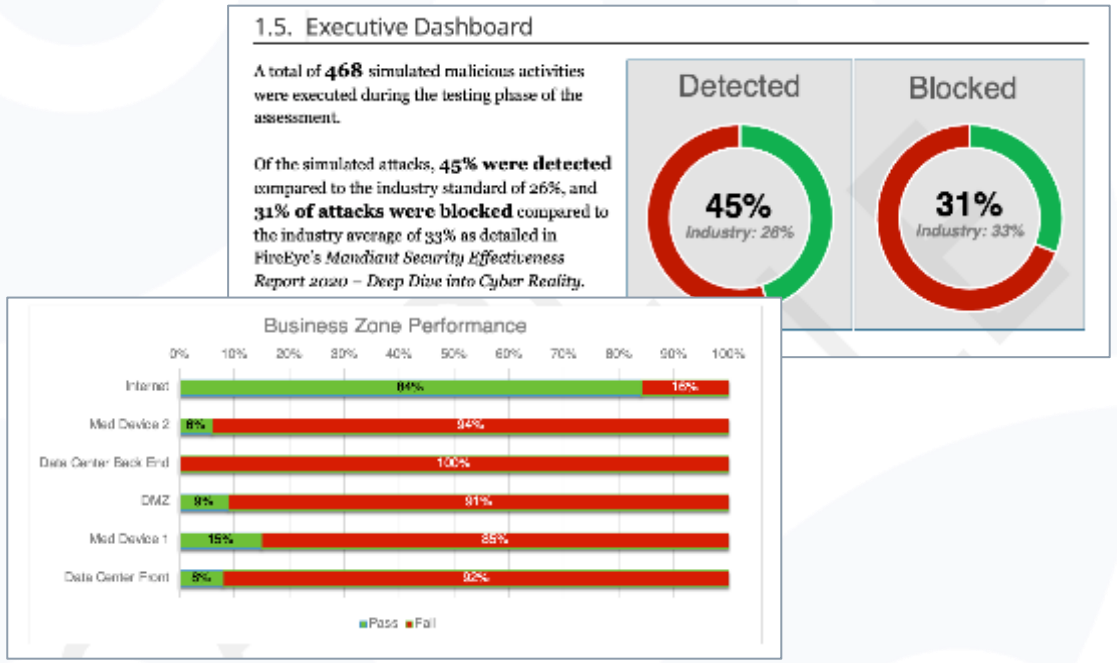
Risk Monitoring (Security Controls Validation)

Secure Controls Validation assesses against an organization's implemented security technologies on how well they respond to the attack scenarios

Features

SCVA Assessment Scenarios:

- An attack from the Internet to an internal network.
- An attack from the internal network out to the Internet.
- An attack from one less trusted internal network to another more trusted internal network.
- An attack including an attempted data loss.
- A ransomware attack affecting an internal network.
- An attack against an endpoint.



The controls validation results in strategic and tactical recommendations on the effectiveness of the controls. We help you interpret the results and make improvements to ensure controls are performing as expected.

Clearwater

Medical Device & IoT Security

Device Discovery & Vulnerability Assessment

- Discover medical devices on your network, identify vulnerabilities in those devices and get recommendations on reducing risk

Program Assessment:

- Identifies gaps in the policies, procedures, and practices that govern device security & risk management

Program Development:

- Policy and procedure development
- Lifecyle management

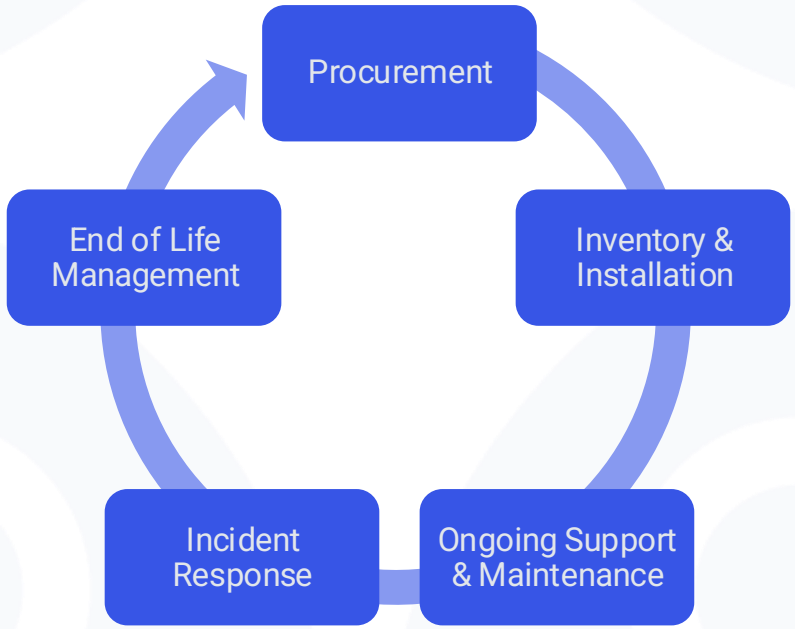
Remediation:

- Gaps identified in the risk analysis
- May include vulnerabilities identified

Program Management

- On-going management of your device security risk management program

Medical Device Support and Management Lifecycle

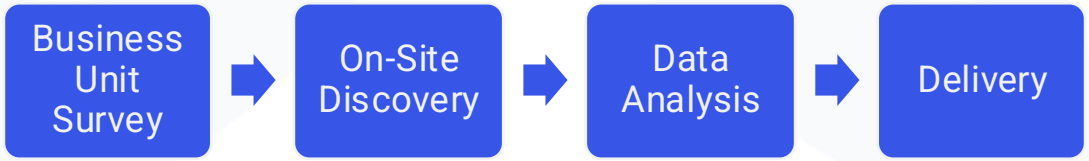


Clearwater

Business Impact Analysis

Understand the impact of incidents and breaches on the organization and your dependency on systems and processes resulting in a strategy prioritizing requirements for recovery.

Working with the organization's business units to identify critical business processes, reliance on information systems, impact on business from loss of availability of systems, and strategy for recovery.



- Conduct Business Impact Analysis across functional business units of the organization
- Capture critical processes
- Capture current recovery capabilities
- Document RTO/RPO requirements
- Create asset tiering
- Documented BIA
- Input into disaster recovery and business continuity planning
- Summarize reports

Incident Response Planning and Testing Services

Assess your organization's Incident Response Program and strengthen areas of weakness.

- **Incident Response Program Assessment**
  - Assess an plans, playbooks, policies, and procedures related to responding and recovering to a cyber incident
- **Ransomware Readiness Review**:
  - Assess plans and playbooks in response to a ransomware attack
- **Incident Response Program Development**
  - Develop or update incident response plan or playbooks

Test your organization's effectiveness at responding to an incident. Support your organization in Incident Response should a compromise occur.

- **Incident Response Tabletop Exercise Standard and Immersive**:
  - Sequencing events as an attack is actually carried out
  - Injecting realistic conditions and tactics of adversaries
  - Mimicking the stress and chaos of an actual incident
  - Sessions with technical staff and with senior leaders
- **Incident Response Advisory & Remediation:**
  - Partnerships with Arista for Compromise Assessment and Groupsense for ransomware negotiation.
  - Clearwater provides remediation on T&M basis

Clearwater's Core Managed Security Services & Managed Cloud Services

Empowering Healthcare with Specialized Managed Security Services

*Our comprehensive suite of services is **purpose-built for healthcare**, delivering 24x7x365 protection, deep compliance expertise, and actionable insights to strengthen your security posture.*

Managed Detection & Response (MDR):

Benefit: *Proactive Threat Neutralization & Rapid Response.*

How: 24x7x365 SOC monitoring, real-time threat hunting, incident containment, and expert remediation guidance. Utilizes advanced EDR and healthcare-specific threat intelligence.

Value: Minimize breach impact, reduce attacker dwell time, ensure continuous vigilance, and reduce alert fatigue for your internal team.

Log Management (SIEM):

Benefit: *Comprehensive Visibility, Compliance, & Faster Investigations.*

How: Centralized collection, correlation, and analysis of security logs from across your entire IT environment.

Value: Meet HIPAA audit requirements, detect anomalous activity, accelerate incident investigation, and gain a unified view of your security landscape.

Vulnerability Management:

Benefit: *Proactive Risk Reduction & Hardened Defenses.*

How: Continuous scanning, identification, prioritization, and actionable reporting on vulnerabilities across systems, applications, and medical devices.

Value: Systematically reduce your attack surface, address critical weaknesses before exploitation, and meet compliance/cyber insurance requirements.

Firewall Management:

Benefit: *Robust Perimeter Defense & Optimized Security Policy.*

How: Expert configuration, 24x7 monitoring, policy enforcement, and ongoing management of your firewall infrastructure.

Value: Ensure strong perimeter security, prevent unauthorized access, offload complex firewall administration, and maintain up-to-date defenses.

Managed Security Services

Provides comprehensive managed security services that combine proprietary event orchestration with leading security vendors to protect businesses from cyberattacks and ransomware

Cybersecurity Software Partners

Cisco
Fortinet
Microsoft Defender for Endpoint
Microsoft Sentinel
OpenSearch
paloalto NETWORKS
Qualys
SentinelOne

Comprehensive MDR

Provides comprehensive managed detection and response services that combine proprietary event orchestration with leading security vendors to protect businesses from cyberattacks and ransomware

Endpoint Detection & Response
Real time endpoint protection for workstation and servers

Firewall Security
Proactive response to protect the perimeter

Vulnerability Management
Threat indicator-based vulnerability identification for proper prioritization and remediation

Log Management
Leverage and retain all logs from systems, servers, applications and the cloud

SOC and Proprietary WARP

24/7/365 Security Operations Center
- *Remote SOC both on-shore and off-shore*
- *Highly scalable*
- *Experienced in verticals Clearwater serves*

Orchestration
- *SOAR*
- *IR & Threat Intelligence*
- *SIEM automation*

People
- *Incident Triage*
- *Threat Hunting Analysis*
- *5 min Response Time*

Response
- *Response Plan*
- *Escalation & Analysis*
- *Portal Event Reporting*

Proprietary WARP Engine
Proprietary data enrichment and support for machine learning enabled orchestration

Clearwater

Managed Azure Cloud Services

Clearwater's Managed Cloud Services for Azure provides design and implementation guidance as well as 24/7 operations and oversight by experts. These services enhance the ability to achieve cloud security, maximize performance, and maintain compliance through growth.

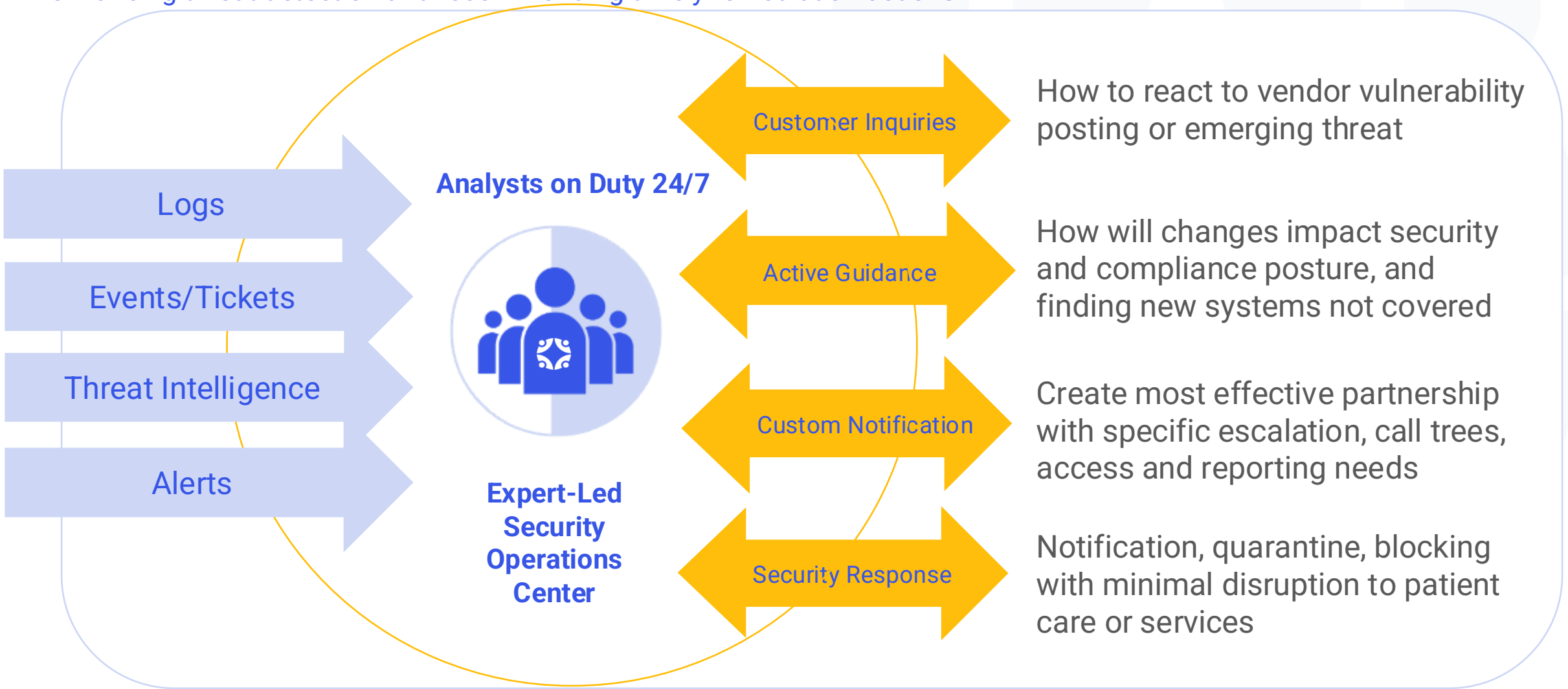
- Cloud platforms do not cover all cybersecurity and compliance needs out of the box.
- Clearwater manages all of these responsibilities including cloud planning, implementation, and optimization combined with managed security services
- Clearwater ensures healthcare organizations meet necessary compliance requirements while reducing risk and improving performance

Core Features	
Azure Cloud **Scalable Services & Security**	• Network, Servers, Azure Services • Managed Security (Cloud & Hybrid) with Clearwater 24/7 Security and Operations Support
Microsoft 365 **Full Operational Support**	• Mail, Storage, Collaboration • Policy Management and Security Logging
Identity Management **Organizational Control**	• Entra ID/Directory Services • Secure Configuration and Monitoring
Virtual Desktop **Reduce Risk Exposure**	• Active Virtual Desktop (AVD) • Protect business and ensure system availability while securing patient data and privacy

Clearwater

Security Operations Center

Clearwater MSS gives visibility to prevented attacks, detected threats and emerging threats with our SOC continuously enhancing threat detection and recommending timely remediation actions



Clearwater

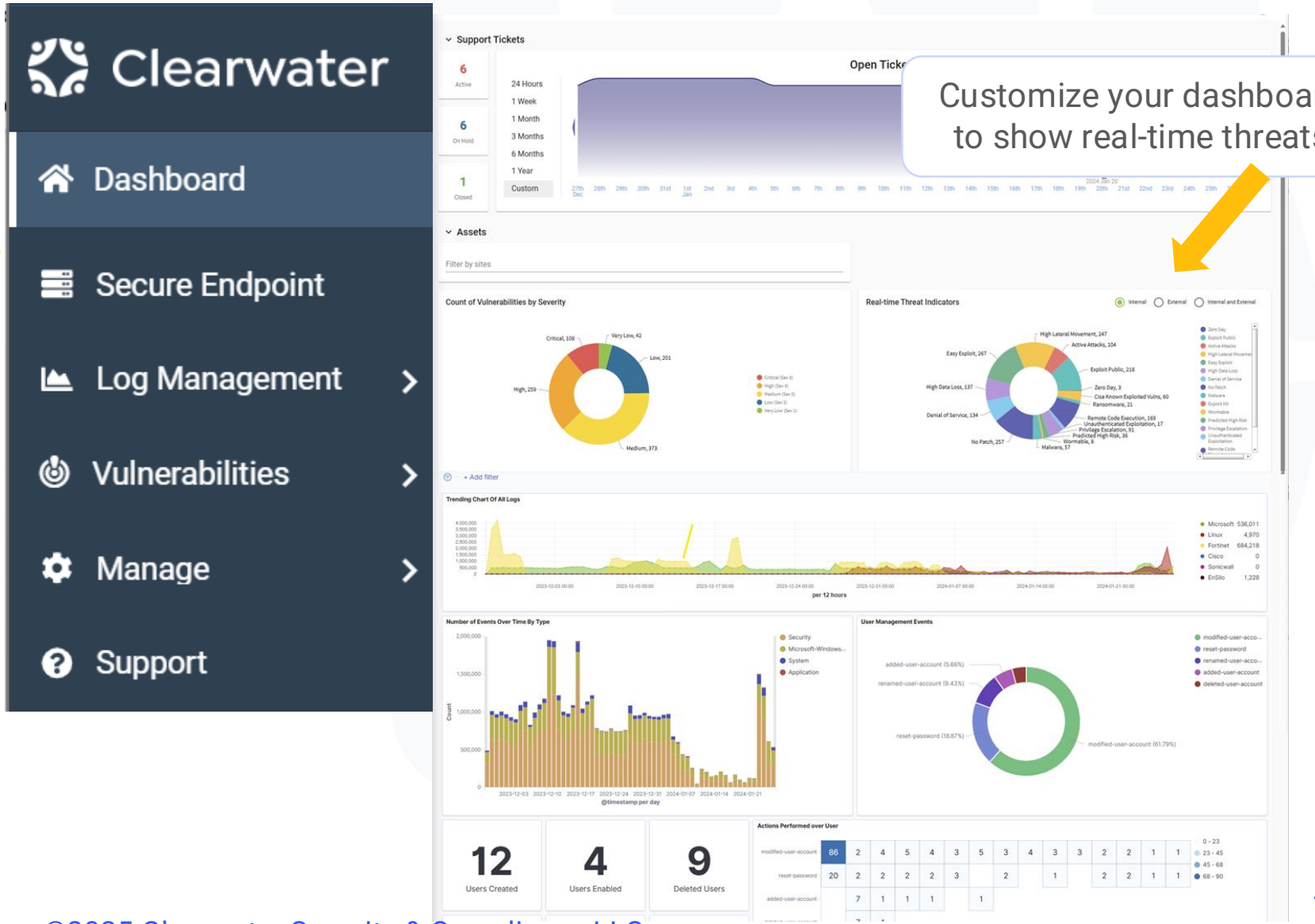
Client Portal – Access to Real-time SOC Views and Tools

Login to the Secure Endpoint View with full asset management

Access Log Management and saved custom searches

View full Vulnerability Management scan findings and initiate re-scans to validate remediations

Granular User Access Management



Customize your dashboard to show real-time threats

Clearwater

Why Partner with Clearwater for Managed Security and Managed Cloud Services ?

Clearwater's Managed Security and Managed Cloud Services help healthcare organizations achieve better security, compliance and resilience in a rapidly evolving threat landscape.

- **Unmatched Healthcare Focus:** Deep understanding of healthcare workflows, regulations (100% OCR success rate in risk analysis), and unique security needs.
- **Reduced Burden, Optimized Resources:** Cost-effectively augment your security capabilities without significant in-house investment.
- **Enhanced Compliance Posture:** Expert guidance and services to achieve and maintain HIPAA, HITRUST, and other certifications.
- **Focus on Patient Care:** Allows your organization to concentrate on its primary mission: delivering exceptional patient care.
- **Increased Resilience:** Strengthen your ability to prevent, detect, respond to, and recover from cyberattacks, ensuring operational stability.

Clearwater

Clearwater's Core Privacy & Compliance Services

Privacy & Compliance Services

Assess

- HIPAA Security Rule Assessment
- HIPAA Privacy Program Assessment
- HIPAA Privacy in Research Assessment
- Compliance Program Effectiveness Assessment
- NIST 800-53 Privacy Controls Assessment
- NIST Privacy Framework Assessment
- Information Blocking Assessment
- CCPA Assessment
- GDPR Assessment
- CMMC Assessments
- GLBA Assessments
- HITRUST Assessments
- SOC 2 Readiness
- 42 CFR, Part 2 Compliance

Build

- Policy & Procedure Development
- Information Blocking Development
- CCPA Program Development
- GDPR Program Development
- Compliance Program Element Development
- Compliance Consulting and Advisory Services

Manage

- Interim/Virtual Privacy Officer
- Virtual Privacy Office Staffing
- Patient Privacy Monitoring
- Interim/Virtual Compliance Officer
- Virtual Compliance Staffing

Validate

- Mock Investigation
- Expert Witness Service
- CMMC Certification
- PCI Certification
- HITRUST Certification

Clearwater

Highlighted Areas of Expertise

HIPAA
Health Insurance Portability & Accountability Act

NIST

HHS 405(d)
Aligning Health Care Industry Security Approaches

HITRUST™

GDPR

CMMC
ACCREDITATION BODY
Cybersecurity Maturity Model Certification

U.S. Department of Justice · Drug Enforcement Administration · Diversion Control Division

PCI Security Standards Council

AICPA SOC
aicpa.org/soc4so
SOC for Service Organizations

Clearwater

10-Point HIPAA Compliance & Cybersecurity Program

A holistic approach for a comprehensive HIPAA Compliance and Cyber Risk Management Program derived from the Office for Civil Rights ("OCR") Enforcement Actions.

Clearwater

Non-Technical Compliance Assessments & Remediation

Ensure compliance with all standards, implementation specifications, and audit protocols of the HIPAA Security, Privacy and Breach Notification Rules, and 405(d) Health Industry Cybersecurity Practices.

Features

- **HIPAA Security, Privacy & Breach Notification Rule, and 405(d) Assessments** are facilitated by a Clearwater Consultant expert to assess compliance with these Rules and standards
- Evaluation and documentation compliance status with the **standards and implementation specifications** exactly as they are set out in the HIPAA Security Rule and the 108 audit inquiries of the HHS/OCR Phase 2 Audit Protocol
- **IRM|Security® and IRM|Privacy®** modules guide assessment, document progress and remediation
- **IRM|405(d) HICP** assesses and documents implementation of Health Industry Cybersecurity Practices (HICP) established under the 405(d) program
- Educate staff on maintaining compliance

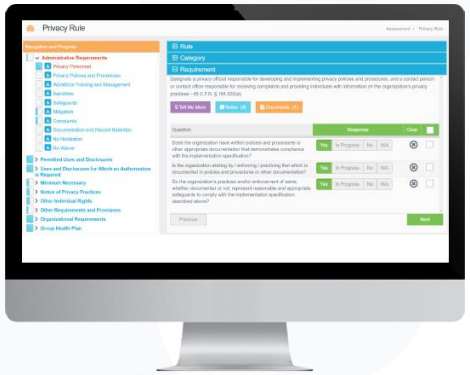
Prepare → Assess → Report

HIPAA Security, Privacy & Breach Notification Rule, and 405(d) Assessments, leveraging our unique IRM|Security® and IRM|Privacy® modules of IRM|Pro® software to guide assessment and document progress of remediation.

IRM | 405(d) HICP™

IRM | Security®

IRM | Privacy®



Clearwater

Certification & Audit

Clearwater can expedite the path to healthcare security certification

- Meet growing requirements for healthcare business associate agreements and partnerships
- Consolidating into a single program saves time, resource and money
- Clearwater provides industry expertise and guidance
- Achieve success no matter where you are starting from

Clearwater offers cybersecurity audit to meet various specific requirements

- IT Audits & IT SOX Audits
- DEA EPCS Audits
- NIST, FISMA, FIPS, FEDRAMP, FFIEC
- SOC2 and ISO 27000 Readiness
- PCI
- HITRUST
- ERP (Oracle, SAP, Peoplesoft)
- Database (Oracle, DB2, SQL Server, Sybase, etc.)
- OS (Windows, UNIX/LINUX, iSeries, z/OS)
- Firewall, IDS/IPS, IAM Audits

Clearwater

Managed Cybersecurity & Compliance Programs

Marquee Managed Services

ClearAdvantage®

A Comprehensive Program to Design, Implement, and Operate a Reasonable and Appropriate Cybersecurity & Compliance Program

Managed Security Services®

24/7 Monitoring, Threat Detection, & Response Services (Network, Cloud, End-Point), Vulnerability & Firewall Management

ClearConfidence™

An On-Going, Risk Analysis, Risk Management & Compliance Program Powered By IRM|Pro®

Vendor Risk Management as a Service™ (VRM)

Our Team Assesses Vendor's Security Controls, Analyzes Risk and Creates Risk Management Plans to Managed Third Party Risk

Cybersecurity Assist Partner Program (CAPP)

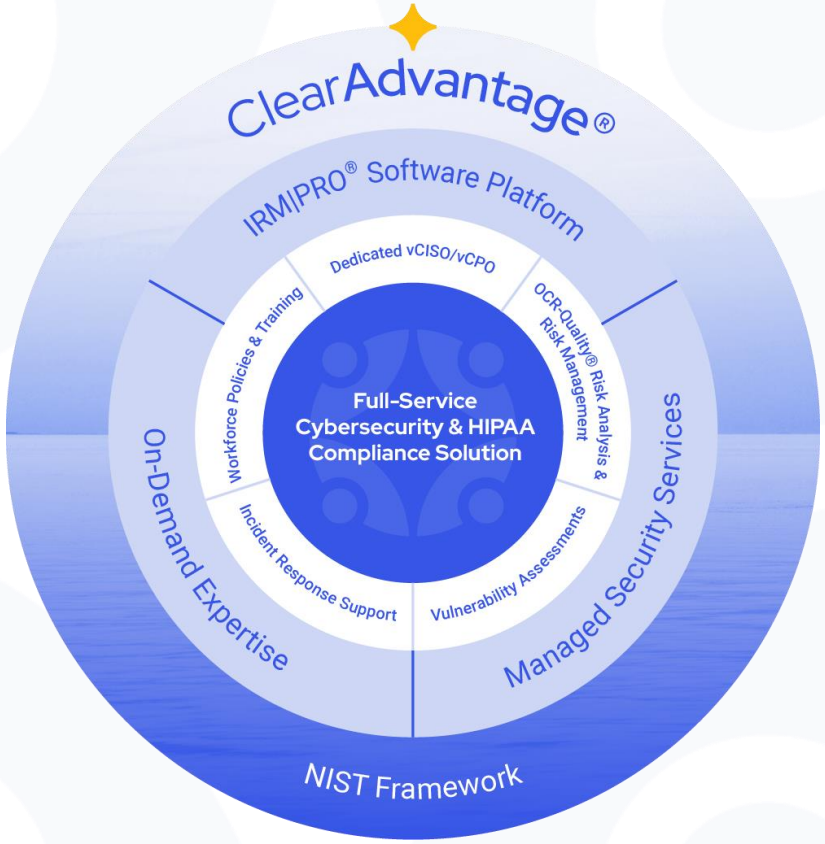
Multi-Year, Compliance, Testing & Advisory Services

Patient Privacy Monitoring Services (PPMS)

We Monitor User Activity on EHR and other Applications and Manage Exceptions as Required by HIPAA (Leveraging 3rd party tools)

The ClearAdvantage® Program

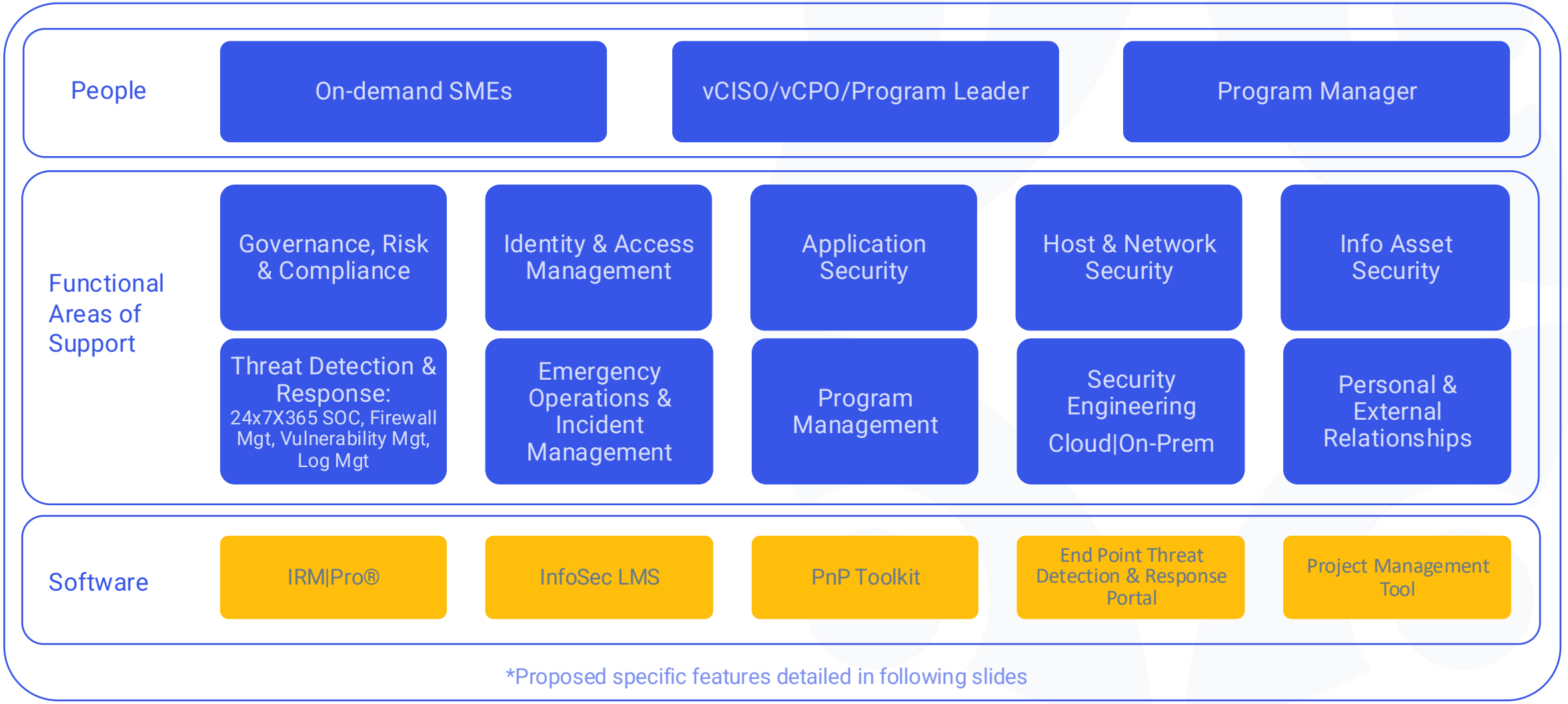
- **An effective outsourced solution to the cybersecurity & HIPAA compliance program challenge**
- Together with our customers, Clearwater developed a program to design, implement and operate a cybersecurity and HIPAA compliance program that is:
  - Reasonable and appropriate for your unique organization
  - Aligned with and facilitates your business's strategic goals and objectives
  - Far less expensive than if you build it your



The ClearAdvantage program is executed over a multi-year period and aligned to each customer's strategic objectives, priorities, and resources.

Clearwater

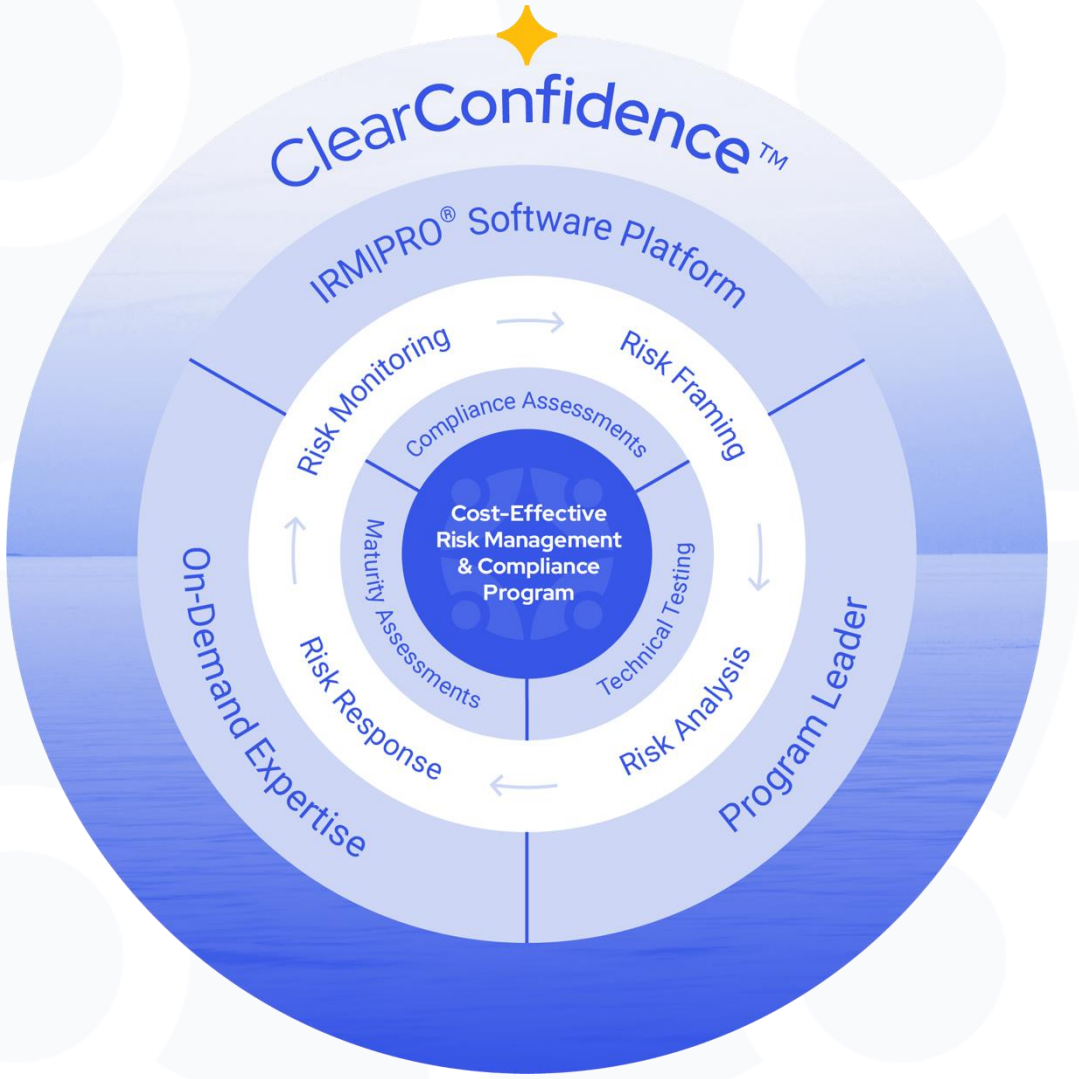
ClearAdvantage Security Framework



*Proposed specific features detailed in following slides

ClearConfidence™

- A more effective and sustainable Enterprise Cyber Risk Management Solution for large organizations with complex IT environments.
  - Dedicated Program Leader with on-going Program Management
  - Ongoing risk analysis and response – continuous program
  - Additional areas of support including compliance assessments, technical testing, controls validation, and Resiliency services
  - Subscription to IRM|Pro included



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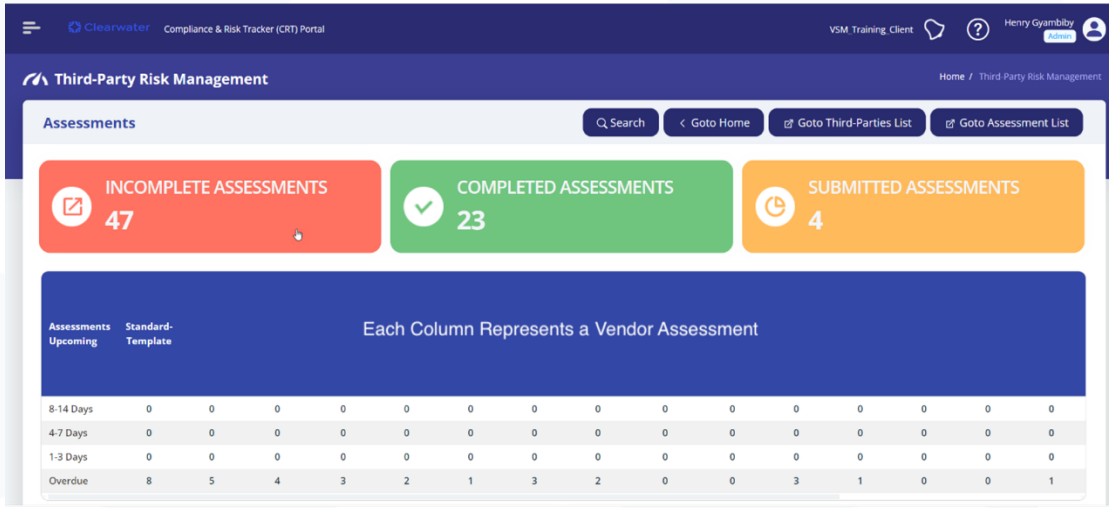
Vendor Risk Management as a Service

Assess, manage and mitigate third party risk more effectively, while alleviating demand on internal resources and gaining efficiency.

- Clearwater assesses vendor security risk for designated third parties
- After initial assessment, you receive the risk level identified for each vendor
- We monitor security risks on an ongoing basis
- Risks, questions, issues, and documents pertaining to the remediation plan are documented and updated



Clearwater

Patient Privacy Monitoring Services

ASSESS

- Comprehensive ePHI user access monitoring
- Proactive monitoring of 100% of all identified users and patients

BUILD

- Review and revise deliverables as needed in accordance with established processes

VALIDATE

- Regular communication
- Review of regular programmatic reports
- Clearwater validation prior to escalating cases and deliverables

MANAGE

- Complete proactive analysis per approved fiscal year plan
- Ongoing consulting services
- Advisory Services

IRM|Pro®
Software Platform

Purpose-Built Software for Cyber Risk Management & HIPAA Compliance

IRM|Analysis®

Insight
Understand significant threats and vulnerabilities

Controls
Determine if you have the right controls in place

Risk Rating
View critical risks on intuitive dashboards and reports

Plan and Evaluate
Plan a course of action to reduce critical risks

Manage Complexity
Automate the management of risk information across complex enterprises

IRM|Security®

Gap Assessment
Against all HIPAA Security standards

Audit Simulation
Against HHS Audit protocols

Recommendations
Automated expert remediation plan

Assign Work
Managed accountability and due dates

Dashboards & Reports
Display period-to-period compliance progress

IRM|Privacy®

Gap Assessment
Against all HIPAA Privacy standards

Breach Preparation
Compliance w/Breach Notification under HITECH

Audit Simulation
Against HHS Audit protocols

Recommendations
Automated expert remediation plan

Dashboards & Reports
Display period-to-period compliance progress

IRM|405(d) HICP™

Gap Assessment
Against all ten 405(d) HICP guidelines, relative to organizational size

Built-in Guide
Walks assessor through the process

Recommendations
Automated expert remediation plan

Dashboards & Reports
Manage accountability and remediation progress, generate audit-ready reports

IRM|Performance™

Maturity Assessment
Against NIST CSF

Performance Score
Demonstrate improvement over time

Dashboards & Reports
Manage accountability and progress, generate reports for the board and ELT

Clearwater

Designed for Healthcare with a 100% OCR Success Rate

IRM | Analysis®

Efficiently and **rigorously** assess, manage, monitor, and report on all cyber risks and all remediation actions.

Insight
Understand significant threats and vulnerabilities

Controls
Determine if you have the right controls in place

Risk Rating Reporting
View critical risks on intuitive dashboards and reports, and produce OCR-Ready Reports

Intelligence
Determine risk levels based on machine learning and AI

Plan and Evaluate
Plan a course of action to reduce high risks

Track Remediation
Initiate risk response and create, assign, and track remediation actions in one place.

Manage Complex Risks
Automate management of information risk across complex enterprises

Benchmarking
Compare your risk metrics to relevant peers

Clearwater

Clearwater

Healthcare–Secure, Compliant, Resilient

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