[REMOVE UPON COMPLETION] **NOTE** The following sections of this report should be filled out as applicable to Paradigm Software Technologies, Inc. DBA Nexelus:

- Section 1 - Name and Description of Application(s)/Product(s)
- Section 2.1 - Specific roles or business units, and the names assigned to each
- Section 2.2 - Additional techniques not already listed
- Section 3.1 - Applicable tech components
- Section 4 - Risk Score and Rating
- Section 5 - Risk Treatment Plan

Paradigm Software Technologies, Inc. DBA Nexelus Risk Assessment Report (RAR)

Upated on June 25,2025 @ 3:09:26 PM UTC

1. Introduction

1.1 Purpose

The purpose of this risk assessment was to identify threats and vulnerabilities related to Nexelus. This risk assessment will be utilized to identify risk mitigation plans related to Nexelus.

1.2 Scope of Risk Assessment

Nexelus manages your project and campaign workflows with improved speed and efficiency, while our dashboards help you stay on top of estimates, costs, time, approval, billing, and profits. What's more, Nexelus is integrated with every major accounting package. Our media platform enables placement of digital media buys on the most predominantly used Ad networks. Using a single sign-on, users can create and execute digital I/Os, reconcile campaign flights, and produce valuable KPI reports. Nexelus works at the core of agency operations to ensure that client's advertising dollars are spent according to plan.

The scope of this assessment includes all components of the application described above. The risk assessment spans the following categories: Engineering, Human Resources (HR), Information Security, Finance, Sales, and Legal.

2. Risk Assessment Approach

2.1 Participants

Role	Participant Name
Partner/CTO	Imran Rahman
Systems Manager	Peter Platkowski
DevOps	Tao Lin
Compliance Officer	Tauseef Shahzad

2.2 Techniques Used

Technique	Definition
Risk Assessment Tool	The assessment team used the Drata software as a service platform to identify and assess applicable risks.
Assessment Tools	The assessment team used several security testing tools to review system configurations and identify vulnerabilities in the application.
Vulnerability Sources	The team accessed several vulnerability sources to help identify potential vulnerabilities. The sources consulted included: • Microsoft Security Advisories (www.microsoft.com/security)

2.3 Risk Model

In determining risks associated with Nexelus, we utilized the following model for classifying risk:

Risk = Likelihood x Impact

And the following definitions:

2.3.1 Threat Likelihood

Likelihood Value	Likelihood Definition
Rare (1.0)	Once in 100+ years or less (<10% chance of occurrence over the life of the company)
Unlikely (2.0)	Once in 50 to 100 years (10% to 35% chance of occurrence over the life of the company)
Possible (3.0)	Once in 25 to 50 years (35% to 65% chance of occurrence over the life of the company)
Likely (4.0)	Once in 2 to 25 years (65% to 90% chance of occurrence over the life of the company)
Almost Certain (5.0)	Up to once in 2 years or more (90% or greater chance of occurrence over the life of the company)

2.3.2 Magnitude of Impact

Impact Value	Impact Definition
Incidental (1.0)	• Minimal loss/damage • Local media attention quickly remedied • Not reportable to regulator • Isolated staff dissatisfaction
Minor (2.0)	• Minor loss/damage • Local reputational damage • Reportable incident to regulator, no follow up • General staff morale problems and increase in turnover
Moderate (3.0)	• Moderate loss/damage • National short-term negative media coverage • Report of breach to regulator with immediate correction to be implemented • Widespread staff morale problems and high turnover
Major (4.0)	• Significant loss/damage • National long-term negative media coverage; significant loss of market share • Report to regulator requiring major project for corrective action • Some senior managers leave, high turnover of experienced staff, not perceived as employer of choice
Extreme (5.0)	• Massive loss/damage • International long-term negative media coverage; game-changing loss of market share •

	Significant prosecution and fines, litigation including class actions, incarceration of leadership • Multiple senior leaders leave

2.3.3 Risk Score Matrix

In representation of the aforementioned likelihood and impact scores, we utilized a risk matrix that can be used to analyze and prioritize risks. The risk ratings were calculated as follows:

- **LOW:** Less than or equal to 4.0
- **MEDIUM:** Greater than 4.0 but less than or equal to 9.0
- **HIGH:** Greater than 9.0 but less than or equal to 16.0
- **CRITICAL:** Greater than 16.0

Risk Score Matrix						
		IMPACT				
		INCIDENTAL (1.0)	MINOR (2.0)	MODERATE (3.0)	MAJOR (4.0)	EXTREME (5.0)
LIKELIHOOD	CERTAIN (5.0)	MEDIUM 5.0 x 1.0 = 5.0	HIGH 5.0 x 2.0 = 10.0	HIGH 5.0 x 3.0 = 15.0	CRITICAL 5.0 x 4.0 = 20.0	CRITICAL 5.0 x 5.0 = 25.0
	LIKELY (4.0)	LOW 4.0 x 1.0 = 4.0	MEDIUM 4.0 x 2.0 = 8.0	HIGH 4.0 x 3.0 = 12.0	HIGH 4.0 x 4.0 = 16.0	CRITICAL 4.0 x 5.0 = 20.0
	POSSIBLE (3.0)	LOW 3.0 x 1.0 = 3.0	MEDIUM 3.0 x 2.0 = 6.0	MEDIUM 3.0 x 3.0 = 9.0	HIGH 3.0 x 4.0 = 12.0	HIGH 3.0 x 5.0 = 15.0
	UNLIKELY (2.0)	LOW 2.0 x 1.0 = 2.0	LOW 2.0 x 2.0 = 4.0	MEDIUM 2.0 x 3.0 = 6.0	MEDIUM 2.0 x 4.0 = 8.0	HIGH 2.0 x 5.0 = 10.0
	RARE (1.0)	LOW 1.0 x 1.0 = 1.0	LOW 1.0 x 2.0 = 2.0	LOW 1.0 x 3.0 = 3.0	LOW 1.0 x 4.0 = 4.0	MEDIUM 1.0 x 5.0 = 5.0

3. System Characterization

3.1 Technology Components

Component	Description
Applications	O365 (various office products)
Databases	SQL Server, Amazon Aurora
Operating Systems	Microsoft Windows
Network(s)	Corporate Network, Azure and AWS
Sub processor(s)	Azure, AWS
Protocols	RDP, HTTPs

4. Risk Assessment Results

The results in this table are generated from the "no" answers on the Risk Assessment Questionnaire.

Risk ID	Observation	Category	Risk	Likelihood	Impact	Risk Score	Risk Rating
1	Paradigm Software Technologies, Inc. DBA Nexelus's sales transactions, volumes, and values are not reviewed monthly and compared to budget.	Sales	Major source of Revenue is SaaS; these renewals are typically yearly. We review during board meetings, which happen every two months or as needed. Any urgent item is reviewed during the weekly management meeting	1	1	1	Low

5. Risk Treatment Plan

Risk ID	Treatment Plan	Treatment Owner	Target Treatment Date	Post-Treat Likelihood	Post-Treat Impact	Residual Risk Score	Applicable Controls for Treatment
		Who is responsible for treating the risk?	*By what date does the treatment need to be completed?*	*What is the likelihood of this risk occurring after treatment?*	*What is the impact of this risk after treatment?*	*Calculate residual risk (likelihood x impact)*	*Which controls are relevant to this risk?*
1	Atlee Brown and Imran Rahman review this as needed or every board meeting, as previously explained, or even in weekly management meeting						

APPENDIX: Q&A from the Risk Assessment Questionnaire

The following is a list of all questions asked and answered on the Risk Assessment Questionnaire. All questions with a "No" response represent a risk and are represented on the tables in sections 4 and 5 of this report.

SALES

Question #1: Are Paradigm Software Technologies, Inc. DBA Nexelus sales transactions, volumes, and values reviewed monthly and compared to budget, and are explanations documented for any significant variances or differences?
Answer #1: No

Question #2: Are Paradigm Software Technologies, Inc. DBA Nexelus sales agreements reviewed by personnel with requisite experience to determine if the revenue recognition criteria are met?
Answer #2: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File server

Question #3: Are Paradigm Software Technologies, Inc. DBA Nexelus sales transactions that trigger promotional allowances or discounts reviewed and approved by management prior to executing an agreement?
Answer #3: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** In the agreement

Question #4: Are total promotional discounts reviewed monthly and compared to budget for significant variance?
Answer #4: Not Applicable

- **Rationale:** It happens only for SaaS agreements which is signed by a signatory authority (either one of the partners)

Question #5: Are the methods by which promotional discounts are calculated and granted

reviewed monthly by management and documented?

Answer #5: Not Applicable

- **Rationale:** These are not applicable for our business model

ENGINEERING

Question #1: Does Paradigm Software Technologies, Inc. DBA Nexelus use industry standards (i.e. OWASP Software Assurance Maturity Model, ISO 27034, BSIMM) to build security into its Systems/Software Development Lifecycle (SDLC)?

Answer #1: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Rapid7 portal

Question #2: Are file integrity (host) and network intrusion detection (IDS) tools implemented to help facilitate timely detection, investigation by root cause analysis, and response to incidents?

Answer #2: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #3: Does Paradigm Software Technologies, Inc. DBA Nexelus use a synchronized time-service protocol (e.g., NTP) to ensure all systems have a common time reference?

Answer #3: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Using Azure for this purpose

Question #4: Does Paradigm Software Technologies, Inc. DBA Nexelus segregate production and non-production environments?

Answer #4: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #5: Are Paradigm Software Technologies, Inc. DBA Nexelus system and network environments protected by a firewall or virtual firewall to ensure business and customer security requirements?
Answer #5: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #6: Does Paradigm Software Technologies, Inc. DBA Nexelus use manual and/or automated source-code analysis to detect security defects in code prior to production?
Answer #6: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Rapid 7 Portal

Question #7: Does Paradigm Software Technologies, Inc. DBA Nexelus review its applications for security vulnerabilities and address any issues prior to deployment to production?
Answer #7: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Rapid7

Question #8: Does Paradigm Software Technologies, Inc. DBA Nexelus conduct application penetration tests of its cloud infrastructure regularly as prescribed by industry best practices and guidance?
Answer #8: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #9: Does Paradigm Software Technologies, Inc. DBA Nexelus have a plan or framework for business continuity management or disaster recovery management?
Answer #9: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #10: Does Paradigm Software Technologies, Inc. DBA Nexelus have policies and

procedures in place to triage and remedy reported bugs and security vulnerabilities for product and service offerings?

Answer #10: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #11: Does Paradigm Software Technologies, Inc. DBA Nexelus have controls in place to restrict and monitor the installation of unauthorized software onto its systems?

Answer #11: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #12: Does Paradigm Software Technologies, Inc. DBA Nexelus have policies/procedures in place to ensure production data shall not be replicated or used in non-production environments?

Answer #12: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #13: Does Paradigm Software Technologies, Inc. DBA Nexelus have key management policies binding keys to identifiable owners?

Answer #13: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** 1Password

Question #14: Does Paradigm Software Technologies, Inc. DBA Nexelus encrypt tenant data at rest (on disk/storage) within its environment as well as data in transit?

Answer #14: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #15: Does Paradigm Software Technologies, Inc. DBA Nexelus restrict, log, and

monitor access to your information security management systems (e.g., hypervisors, firewalls, vulnerability scanners, network sniffers, APIs, etc.)?

Answer #15: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #16: Does Paradigm Software Technologies, Inc. DBA Nexelus centrally store and retain infrastructure audit logs, and review them on a regular basis for security events (e.g., with automated tools)?

Answer #16: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #17: Do Paradigm Software Technologies, Inc. DBA Nexelus capacity requirements take into account current, projected, and anticipated capacity needs for all systems used to provide services to the tenants?

Answer #17: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #18: Does Paradigm Software Technologies, Inc. DBA Nexelus regularly update network architecture diagrams that include data flows between security domains/zones?

Answer #18: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #19: Does Paradigm Software Technologies, Inc. DBA Nexelus collect capacity and use data for all relevant components of its cloud service offering?

Answer #19: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #20: Do Paradigm Software Technologies, Inc. DBA Nexelus engineers review code

changes for injection flaws, such as SQL injections and OS command injections?
Answer #20: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Rapid7

Question #21: Does Paradigm Software Technologies, Inc. DBA Nexelus deliver SDLC and/or OWASP Top 10 training to full-time and contractor developers who develop or maintain code and infrastructure that can affect the security of the system?
Answer #21: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #22: Does Paradigm Software Technologies, Inc. DBA Nexelus consistently identify systems that contain user data as containing user data in an inventory list of digital assets?
Answer #22: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #23: Does Paradigm Software Technologies, Inc. DBA Nexelus configure networks to restrict inbound and outbound traffic to only that which is necessary, especially for sensitive assets, such as databases and storage points that contain sensitive user data?
Answer #23: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure Portal

Question #24: Does Paradigm Software Technologies, Inc. DBA Nexelus conduct functionality testing on new code changes to ensure changes do not adversely affect the availability or security of the system?
Answer #24: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #25: Does Paradigm Software Technologies, Inc. DBA Nexelus enforce a QA stage within its development practices that include testing functionality on a staging server before

code is pushed to production.
Answer #25: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure VM for staging/Release Environment

Question #26: Do Paradigm Software Technologies, Inc. DBA Nexelus web endpoints meet an 'A' grade according to securityheaders.io?
Answer #26: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure DevOps

Question #27: Does the Paradigm Software Technologies, Inc. DBA Nexelus web framework escape all rendered output, e.g., React JSX?
Answer #27: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DevOps

Question #28: Does Paradigm Software Technologies, Inc. DBA Nexelus enforce application password requirements?
Answer #28: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure DevOps

Question #29: Does Paradigm Software Technologies, Inc. DBA Nexelus monitor for and apply security patches for vulnerabilities in third party libraries and their dependencies?
Answer #29: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Rapid7

LEGAL

Question #1: Does Paradigm Software Technologies, Inc. DBA Nexelus have predefined communication channels for workforce personnel and external business partners to report

incidents in a timely manner adhering to applicable legal, statutory, or regulatory compliance obligations?

Answer #1: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** O365

Question #2: Does Paradigm Software Technologies, Inc. DBA Nexelus legal counsel review all third-party agreements?

Answer #2: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** O365

Question #3: Do third-party agreements include provision for the security and protection of information and assets?

Answer #3: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server

Question #4: Does Paradigm Software Technologies, Inc. DBA Nexelus have the capability to recover data for a specific customer in the case of failure or data loss?

Answer #4: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure

Question #5: Does Paradigm Software Technologies, Inc. DBA Nexelus have the capability to restrict the storage of customer data to specific countries or geographic locations?

Answer #5: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure

Question #6: Can Paradigm Software Technologies, Inc. DBA Nexelus provide the physical location/geography of storage of a tenant's data upon request?

Answer #6: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure

Question #7: Does Paradigm Software Technologies, Inc. DBA Nexelus provide the client with a list and copies of all sub-processing agreements and keep this updated?
Answer #7: Not Applicable

- **Rationale:** This is not applicable to our business

Question #8: Does Paradigm Software Technologies, Inc. DBA Nexelus mandate annual information security reviews and audits of its third party providers to ensure that all agreed upon security requirements are met?
Answer #8: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure

Question #9: Does Paradigm Software Technologies, Inc. DBA Nexelus have external third-party services conduct vulnerability scans and periodic penetration tests on its applications and networks?
Answer #9: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Azure

HR

Question #1: Does Paradigm Software Technologies, Inc. DBA Nexelus require employment agreements to be signed by newly hired or onboard workforce personnel prior to granting access to corporate facilities, resources, and assets?
Answer #1: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server

Question #2: Does Paradigm Software Technologies, Inc. DBA Nexelus conduct background verification screenings for all employees and contractors?
Answer #2: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server

Question #3: Do Paradigm Software Technologies, Inc. DBA Nexelus employment offers include non-disclosure or confidentiality agreements reflecting the organization's needs for the protection of data and operational details?
Answer #3: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server

Question #4: Does Paradigm Software Technologies, Inc. DBA Nexelus define allowance and conditions for BYOD devices and its applications to access corporate resources?
Answer #4: Not Applicable

- **Rationale:** We only allow using corporate assets to access the system

Question #5: Does Paradigm Software Technologies, Inc. DBA Nexelus provide a formal security awareness training program for all applicable personnel at least once per year?
Answer #5: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #6: Does Paradigm Software Technologies, Inc. DBA Nexelus document employee acknowledgment of training they have completed?
Answer #6: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #7: Does Paradigm Software Technologies, Inc. DBA Nexelus specifically train its employees regarding their specific role and the information security controls they must fulfill?
Answer #7: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #8: Is successful completion of security awareness training considered a prerequisite for acquiring and maintaining access to sensitive systems?
Answer #8: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #9: Are Paradigm Software Technologies, Inc. DBA Nexelus personnel informed of their responsibilities for maintaining awareness and compliance with published security policies, procedures, standards, and applicable regulatory requirements?
Answer #9: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #10: Are Paradigm Software Technologies, Inc. DBA Nexelus personnel informed of their responsibilities for maintaining a safe and secure working environment?
Answer #10: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #11: Are Paradigm Software Technologies, Inc. DBA Nexelus personnel informed of their responsibilities for ensuring that equipment is secured and not left unattended?
Answer #11: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #12: Does Paradigm Software Technologies, Inc. DBA Nexelus have asset return procedures for terminated employees outlining how company assets should be returned within an established period?
Answer #12: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server

FINANCE

Question #1: Does Paradigm Software Technologies, Inc. DBA Nexelus restrict and/or control access to your accounting software and digital records?
Answer #1: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Active Directory

Question #2: Does Paradigm Software Technologies, Inc. DBA Nexelus compare two independent sets of records for one set of transactions? (ex: matching delivery receipts to vendor payments, matching bank statements to the general ledger)?
Answer #2: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** System and/or the file server

Question #3: Does Paradigm Software Technologies, Inc. DBA Nexelus continuously monitor its financial performance? (ex: comparing budgeted to actual cash flow)
Answer #3: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** file server

Question #4: Does Paradigm Software Technologies, Inc. DBA Nexelus segregate various financial responsibilities? (ex: requiring two people to make
purchases: one signs checks, one authorizes the purchase)?
Answer #4: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server

Question #5: Are new Paradigm Software Technologies, Inc. DBA Nexelus Finance employees trained in its financial reporting control requirements?
Answer #5: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Email or the file server

Question #6: Are new Paradigm Software Technologies, Inc. DBA Nexelus bank accounts or credit cards only opened through the direction and approval of appropriate Management?
Answer #6: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Forms, agreements, email

Question #7: Are all of the checks manually generated by Paradigm Software Technologies, Inc. DBA Nexelus reviewed and approved by a Finance Manager?
Answer #7: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** DynamicsGP

Question #8: Do Paradigm Software Technologies, Inc. DBA Nexelus Finance personnel prepare amortization schedules for all recorded prepaid expenses, to then be reviewed and approved by management?
Answer #8: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server

Question #9: Does Paradigm Software Technologies, Inc. DBA Nexelus management periodically review a fixed assets register to verify the existence and right to the assets, and document and report on the findings?
Answer #9: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server or Email

Question #10: Are Paradigm Software Technologies, Inc. DBA Nexelus employee benefit obligation adjustments regularly compared to budget and are significant variances investigated and reported on?
Answer #10: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Email or File Server

Question #11: Does Paradigm Software Technologies, Inc. DBA Nexelus management conduct monthly financial statement reviews to compare to budget, and investigate significant variances?
Answer #11: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Email

Question #12: Are Paradigm Software Technologies, Inc. DBA Nexelus invoices authorized and accompanied by appropriate supporting documentation, and only after confirming the customer exists in a master customer file?
Answer #12: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** System

SECURITY

Question #1: Are Paradigm Software Technologies, Inc. DBA Nexelus information security policies and procedures made available to all impacted personnel and business partners, authorized by accountable business role/function and supported by the information security management program as per industry best practices (e.g. ISO 27001, SOC 2)?
Answer #1: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata and Email

Question #2: Does Paradigm Software Technologies, Inc. DBA Nexelus disclose which controls, standards, certifications, and/or regulations it complies with?
Answer #2: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Email based on Customer request

Question #3: Are Paradigm Software Technologies, Inc. DBA Nexelus technical, business, and executive managers responsible for maintaining awareness of and compliance with security policies, procedures, and standards for both themselves and their employees as they pertain to the manager and employees' area of responsibility?
Answer #3: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #4: Does Paradigm Software Technologies, Inc. DBA Nexelus have the capability to continuously monitor and report the compliance of its infrastructure against its information security baselines?

Answer #4: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata and Rapid7

Question #5: Does Paradigm Software Technologies, Inc. DBA Nexelus conduct risk assessments associated with data governance requirements at least once a year?
Answer #5: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #6: Is a formal disciplinary or sanction policy established for employees who have violated security policies and procedures?
Answer #6: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata or file server

Question #7: Are employees made aware of what actions could be taken in the event of a violation via their policies and procedures?
Answer #7: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** File Server, plus Drata policy where applicable

Question #8: Does Paradigm Software Technologies, Inc. DBA Nexelus perform, at minimum, annual reviews to its privacy and security policies?
Answer #8: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #9: Is the likelihood and impact associated with inherent and residual risk determined independently, considering all risk categories?
Answer #9: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Risk Register

Question #10: Does Paradigm Software Technologies, Inc. DBA Nexelus have a documented security incident response plan?
Answer #10: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Drata

Question #11: Has Paradigm Software Technologies, Inc. DBA Nexelus tested its security incident response plans in the last year?
Answer #11: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Either Dev Ops or Drata

Question #12: Does Paradigm Software Technologies, Inc. DBA Nexelus conduct application-layer and network-layer vulnerability scans regularly as prescribed by industry best practices?
Answer #12: Yes

- **If applicable, where and/or how do you track this or maintain evidence for it?** Rapid7