



Bank-A-Count Corp.
Rudolph, Wisconsin

System and Organization Controls Report
Relevant to Security, Processing Integrity, and
Confidentiality of the Print Services System

SOC 3[®] Report

November 1, 2019 to May 31, 2020



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Bank-A-Count Corp.

**System and Organization Controls Report Relevant to Security, Processing
Integrity, and Confidentiality
November 1, 2019 to May 31, 2020**

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Section 1

Bank-A-Count Corp.'s Assertion on Controls

Bank-A-Count Corp.'s Assertion on Controls

We are responsible for designing, implementing, operating, and maintaining effective controls within Bank-A-Count Corp.'s Print Services system throughout the period November 1, 2019 to May 31, 2020, to provide reasonable assurance that Bank-A-Count Corp.'s service commitments and system requirements relevant to security, processing integrity, and confidentiality were achieved. Our description of the boundaries of the system is presented in Attachment A and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period November 1, 2019 to May 31, 2020, to provide reasonable assurance that Bank-A-Count Corp.'s service commitments and system requirements were achieved based on the trust services criteria relevant to security, processing integrity, and confidentiality (the "applicable trust services criteria") set forth in TSP Section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* (AICPA, *Trust Services Criteria*). Bank-A-Count Corp.'s objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria. The principle service commitments and system requirements related to the applicable trust services criteria are presented in Attachment B.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls within the system were effective throughout the period November 1, 2019 to May 31, 2020, to provide reasonable assurance that Bank-A-Count Corp.'s service commitments and system requirements were achieved based on the applicable trust services criteria.

Section 2

Independent Service Auditor's Report

Independent Service Auditor's Report

Management of Bank-A-Count Corp.
Rudolph, Wisconsin

Scope

We have examined Bank-A-Count Corp.'s accompanying assertion titled "Bank-A-Count Corp.'s Assertion on Controls" (the "assertion") that the controls within Bank-A-Count Corp.'s system were effective throughout the period November 1, 2019 to May 31, 2020, to provide reasonable assurance that Bank-A-Count Corp.'s service commitments and system requirements were achieved based on the trust services criteria relevant to security, processing integrity, and confidentiality (the "applicable trust services criteria") set forth in TSP Section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* ("AICPA, Trust Services Criteria").

Service Organization's Responsibilities

Bank-A-Count Corp. is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that Bank-A-Count Corp.'s service commitments and system requirements were achieved. Bank-A-Count Corp. has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Bank-A-Count Corp. is responsible for selecting, and identifying in its assertion, the applicable trust services criteria and for having a reasonable basis for its assertion by performing an assessment of the effectiveness of the controls within the system.

Service Auditor's Responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements.
- Assessing the risks that controls were not effective to achieve Bank-A-Count Corp.'s service commitments and system requirements based on the applicable trust services criteria.
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve Bank-A-Count Corp.'s service commitments and system requirements based the applicable trust services criteria.

Our examination also included performing such other procedures as we considered necessary in the circumstances.

Independent Service Auditor's Report (Continued)

Inherent Limitations

There are inherent limitations in the effectiveness in any system of internal control, including the possibility of human error and the circumvention of controls.

Because of their nature, controls may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusion about the effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies and procedures may deteriorate.

Opinion

In our opinion, management's assertion that the controls within Bank-A-Count Corp.'s Print Services system were effective throughout the period November 1, 2019 to May 31, 2020, to provide reasonable assurance that Bank-A-Count Corp.'s service commitments and system requirements were achieved based on the applicable trust services criteria, is fairly stated, in all material respects.

Wipfli LLP

Wipfli LLP

Minneapolis, Minnesota
May 31, 2020

Attachment A

Description of Bank-A-Count Corp.'s Print Services System

Description of Bank-A-Count Corp.'s Print Services System

Company Overview

Bank-A-Count Corp. ("Bank-A-Count") serves as a printer and mailer of documents containing variable data commonly used in financial services, property management, and markets with similar needs.

The main products of Bank-A-Count include personal and business checks, payment coupons, variable printed letters or announcements, monthly statements, and related products.

Privately owned, Bank-A-Count serves companies across the United States and has a customer base of over a thousand clients that place ongoing repeat orders.

Bank-A-Count maintains two separate manufacturing and servicing facilities in Rudolph, Wisconsin, and an administrative support office in nearby Wisconsin Rapids, Wisconsin.

Regulation

Bank-A-Count Corp. is required to adhere to regulations as they apply to customers. Services rendered require compliance with the Gramm-Leach-Bliley Act (GLBA), the Health Insurance Portability and Accountability Act (HIPAA) standards, and the Sarbanes-Oxley Act (SOX) (third-party provider accordance).

Risk Management

Employees of Bank-A-Count, from line staff to senior management, have a responsibility for maintaining an effective internal control environment. Bank-A-Count's risk management policies provide guidelines for an enterprise-wide risk management program, including mission, strategic objectives, and corporate governance structure, as well as key program components and initiatives. Bank-A-Count has established principles and policies for identifying, assessing, monitoring, and controlling risk across the organization. Risk management efforts include provisions for compliance, operations, data integrity, reputation risk, and privacy and security. Common risk scenarios are tracked and graded based on their overall risk to the company, as well as individual risk factors. Risk escalation and assessment procedures are structured to provide employees with the tools necessary for mitigating risk and identifying process improvement opportunities.

Organizational Structure

Bank-A-Count is organized into segments including customer service, operations, information technology, human resources, marketing, and the management team. These segments work together to achieve one common goal: providing customers with flexible service solutions supported by reliable systems and a responsive staff.

The Board of Directors, made up of senior management and independent directors, sets strategic goals and the corporate vision and periodically reviews policies and procedures developed by the management team. The management team works with department supervisors to develop policies, procedures, and reporting mechanisms for day-to-day operations. Supervisors and production staff implement the policies and procedures to facilitate the corporate vision.

Description of Bank-A-Count Corp.'s System

Organizational Structure (Continued)

Policies

Bank-A-Count has numerous policies in place to address the varying intricacies of its business. Policy statements exist for select enterprise functions and range from covering risk management programs to covering policies that guide personnel decisions. More specifically, policies are in place to address appropriateness with regard to infrastructure, software, people, procedures, and data. Bank-A-Count's policies are designed to protect the confidentiality, processing integrity, and security of its system and operations and to safeguard its business information and that of its customers and user organizations.

Policies defined as important to the organization are communicated to personnel with regular frequency. Existing employees periodically receive ongoing training on companywide policies. These policies are addressed with new hires at the time of an initial orientation and during appropriate follow-up sessions. New hires are informed of other policies that pertain directly to their work during on-the-job training within their department. Bank-A-Count's employee handbook is posted on the internal intranet site and available for employees' review of pertinent policies.

Bank-A-Count's policies are periodically reviewed, as necessary, with updates approved by the president and senior vice president. Changes to company policies are communicated to staff as soon as feasible. New policies are established, or updates to existing ones are considered, to comply with environmental, regulatory, or technological changes that may impact business. Likewise, competitive situations or other outside influence, regulatory compliance, or internal considerations may also drive attention to policy statements. Policies are subject to ongoing monitoring by management.

Employees aware of policy infringements or those who have concerns related to policy terms are instructed to report the issue immediately to supervisory personnel within their department or facility or to a member of the management team.

General Computer Controls

General computer controls establish the control environment in which computer application systems are developed and operated.

The following areas of the data processing environment and general controls for Bank-A-Count are addressed:

Overview of Processing Environment

Bank-A-Count uses a dedicated department and personnel to support the document processing functions. Bank-A-Count incorporates various general computer controls to support and maintain software packages that are relevant to Bank-A-Count's document solutions product line. All systems are physically located in two Rudolph, Wisconsin, production facilities and an administrative and marketing support location in Wisconsin Rapids, Wisconsin.

Production Processing

Bank-A-Count employees perform and monitor the preprocessing of production data for checks, variable print mailings, and coupon books in various print formats. Bank-A-Count uses software to assist in the monitoring of required process controls and tasks to ensure the proper outcome of the process. Bank-A-Count uses a third-party-provided postal processing software package and applies postal system updates, as required, for internal applications. Changes to the production processing environment are reviewed regularly.

Description of Bank-A-Count Corp.'s System

General Computer Controls (Continued)

Critical Infrastructure

Bank-A-Count leverages third-party hosted infrastructure to host the bank-a-count.com identity provider and portal components.

The third party provides multizone redundancy, auto-scaling capabilities, and multi-region failovers. It provides physical security, environmental protection, and redundant infrastructure to Bank-A-Count. Bank-A-Count's management team obtains and reviews the third party's SOC report to evaluate the internal control environment and the impact of exceptions noted for relevant Bank-A-Count controls.

Physical Access Controls

Both Bank-A-Count and its hosted infrastructure provider have policies and procedures in place to control access to its data processing facilities and assets. These policies and procedures limit the physical access to confidential data to individuals designated by Bank-A-Count's management team.

Change and Configuration Controls

Changes to system software are approved by management and deployed by the senior vice president of information technology.

Major system changes and projects are accompanied by regular status reports to Bank-A-Count's management for review of milestones and security implications.

Logical Security, Access, and Audit Controls

Bank-A-Count's staff is responsible for developing standards and administering logical security for selected systems and applications. They follow documented policies and procedures to establish access to information assets based on employees' roles in the organization on a need-to-know basis.

Fault Tolerance and Data Recovery

A tested backup system is in place.

Intrusion Detection and Incident Response

An active intrusion detection system (IDS) monitors the network for suspicious activity.

Firewall Controls

Bank-A-Count in coordination with its third-party provider has deployed a managed firewall solution to help protect its network.

Antivirus and Antispyware Controls

The network environment is protected by a multilayered antivirus system.

Environmental Controls

Bank-A-Count and its hosted infrastructure provider install and maintain support equipment for controlling environmental conditions of the servers and telecommunications equipment.

Attachment B

Principle Service Commitments and System Requirements

Principle Service Commitments and System Requirements

Bank-A-Count designs its processes and procedures related to variably printed documents to meet its objectives for the successful delivery of printed products. Those objectives are based on the service commitments Bank-A-Count makes to user entities, the laws and regulations that govern the provision of checks and other printed products, and the financial, operational, and compliance requirements Bank-A-Count has established for the services. The print services of Bank-A-Count are subject to the security and privacy requirements of the GLBA as well as state privacy security laws and regulations in the jurisdictions in which Bank-A-Count operates.

Security, confidentiality, and processing integrity commitments to user entities are documented and communicated in service level agreements (SLA) and other customer agreements, as well as in the description of the service offering provided online.

- Security commitments include principles within the fundamental designs to permit system users to access the information they need based on their roles in the system while restricting them from accessing information not needed for their role.
- Confidentiality commitments include the use of encryption technologies to protect customer data both at rest and in transit.

Bank-A-Count establishes operational requirements that support the achievement of security commitments, relevant laws and regulations, and other system requirements. Such requirements are communicated in Bank-A-Count's system policies and procedures, system design documentation, and contracts with customers. Information security policies define an organization-wide approach to how systems and data are protected. These include policies related to how the service is designed and developed, the system is operated, the internal business systems and networks are managed, and employees are hired and trained. In addition to these policies, standard operating procedures have been documented on how to carry out specific manual and automated processes required when providing variable print document services.