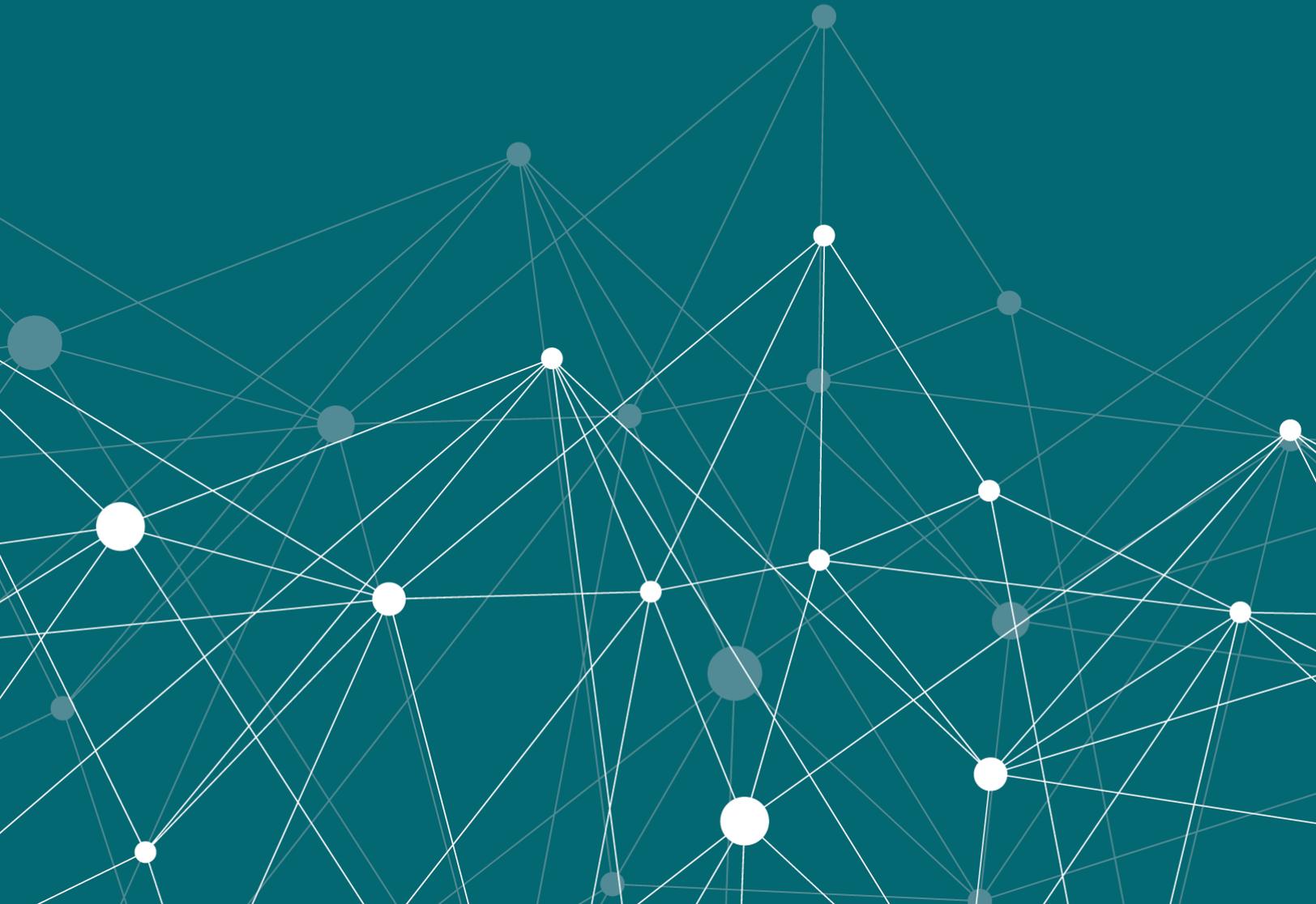




FUEL CYCLE SECURITY FAQ



EXECUTIVE SUMMARY

This FAQ is intended to give the reader an overview of Fuel Cycle security processes and procedures. It describes key security-related processes performed in all areas of the company, and addresses the security measures we've taken to protect each of those processes (such as secure data collection and disaster recovery). The key differentiator of Fuel Cycle and many other SaaS research companies is this: Customers own and control their data and users. Fuel Cycle treats all customer data as highly confidential, and does not attest or represent the data. In other words, we don't know what data are being collected, and customers are free to use the services as they wish. We use industry best practices to keep data safe from criminals and hackers, and have devised proprietary methods to prevent disclosing data to the wrong requester due to programming errors.



OUR WEB-BASED SOFTWARE PRODUCT

Community Features

Our focus on media-rich and member-focused technology connects you to your community members – wherever they are.

Ideas & Innovation

Enable your members to share ideas at the point of inspiration, while commenting and ranking others.

Live Chat

Allow your members to view rich media, respond to poll questions and engage in live dialogue with your brand team, executives, or fellow community members.

Polls & Surveys

Engage your members with over 100 interactive question types with direct, normalized responses including drag and drop, skip logic, multi-select and file uploads. Also allows for open-ended submissions and digital diaries.

Discussions

Interact with your members in asynchronous, media-supported message boards with options to rate other member posts, share and embed rich media and initiate new discussion topics to openly share knowledge.

User Profiles & Dynamic Grouping

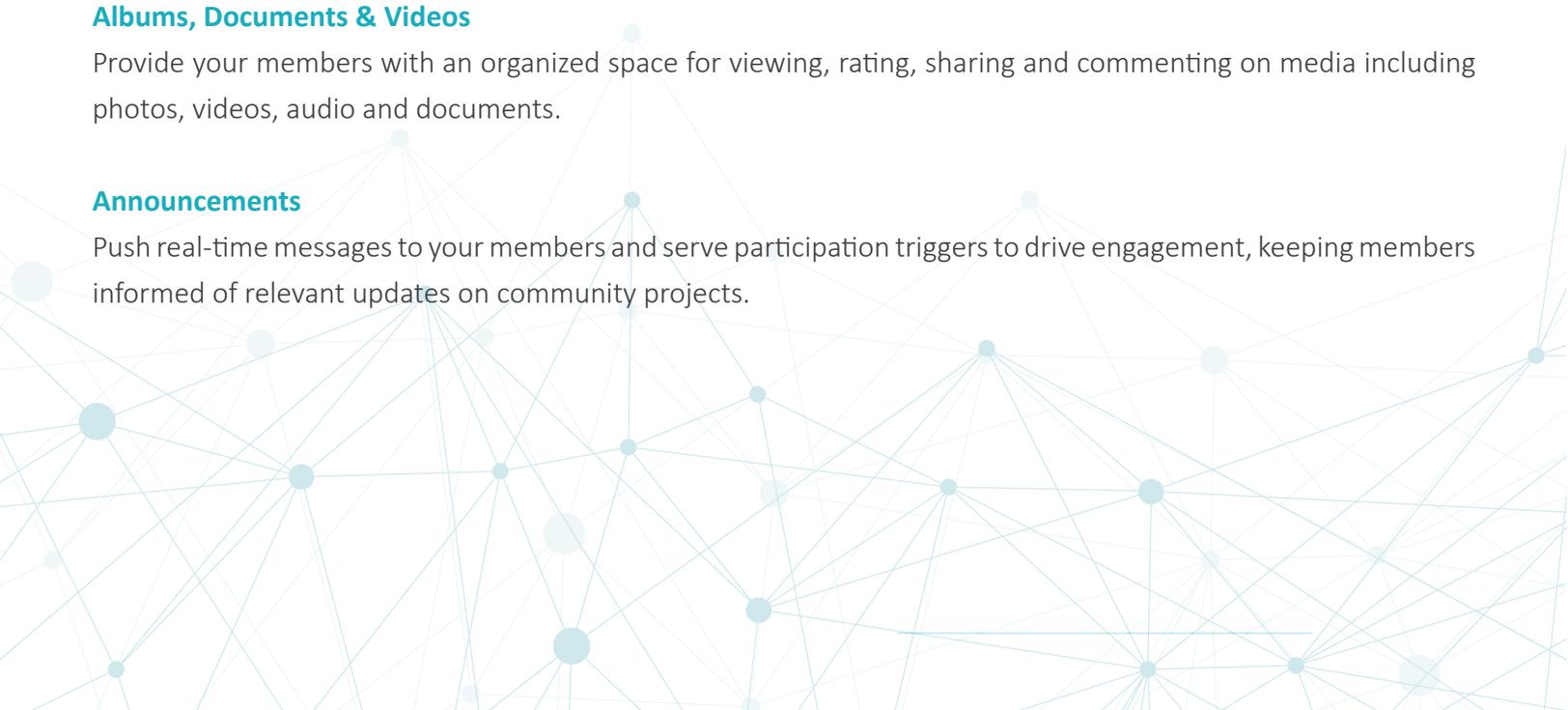
Segment your members using the visual directory and dig deeper by viewing, filtering and sorting profile data to build a deep understanding of the members in real-time.

Albums, Documents & Videos

Provide your members with an organized space for viewing, rating, sharing and commenting on media including photos, videos, audio and documents.

Announcements

Push real-time messages to your members and serve participation triggers to drive engagement, keeping members informed of relevant updates on community projects.



OVERVIEW OF OUR DATA SECURITY

Fuel Cycles' most important concerns are the protection and reliability of customer data. Our servers are protected by high-end firewall systems, and vulnerability scans are performed regularly. All services have quick failover points with redundant hardware, and complete encrypted backups are performed nightly. Fuel Cycle uses Secure Socket Layer (SSL) encryption for all transmitted Internet data. Access to the Fuel Communities is protected via Username and Password, with support for Strong and Complex Passwords. Our services are hosted by AWS who meets the following Attestations: DoD SRG, Cyber Essentials Plus, C5, FedRamp, FIPS, IRAP, ISO 9001, ISO 27001, ISO 27017, ISO 27018, MLPS Level 3, MTCS, PCI DSS Level-1. SEC Rule 17-a-4, SOC 2, and SOC 1 All data at rest are encrypted AES 256, and data on deprecated hard drives are destroyed by U.S. DOD methods

Security within our Fuel Technology Platform

All Fuel Cycle products enable customers to control individual permissions of their accounts and communities. In other words, Super Moderators decide who creates, manages and can view content and run reports.

Fuel Cycle SLA's

Fuel Cycle serves many organizations in the US and around the Globe and as a result Fuel Cycle must maintain the highest service levels and create environments to minimize downtime. Since 2010, Fuel Cycle has maintained average up-time of 99.97%.

Disaster Recovery Plan

Within the continental U.S., Fuel Cycle maintains production servers in geographically and geologically distinct areas. Fuel Cycle is prepared to quickly shift to unaffected servers in the event of any local catastrophe.

Our Commitment to Data Security

Keeping customer data secure is of paramount importance. Many of our customers demand the highest levels of data security, and have tested our systems to ensure it meets their standards. In each case, we have surpassed expectations and received high praise from top companies. All Fuel Cycle accounts are password protected, and all data are replicated in real-time. Passwords are salted, then hashed and stored, making them unknown to any Fuel Cycle employee. Fuel Cycle IDs may be linked to the customer's single sign-on services.

Encryption at Rest

All data within the Fuel Cycle platform is encrypted at rest AES 256 within the AWS RDS environments.

WHO OWNS THE DATA IN FUEL CYCLE SERVICES

Customers own and control all data entered in or collected by Fuel Cycle Services. This includes survey definitions, response data, panel data, uploaded content such as graphics, user information, and report results/analysis from such data. Fuel Cycle may collect anonymous usage statistics (such as number of responses collected) for analyzing performance and calculating account quotas. Fuel Cycle only uses customer data to perform the functions required in the Service (such as creating reports). No customer data are ever shared or distributed. And since Fuel Cycle products are self-service, data are essentially invisible to our staff; customers operate on their own accord. Fuel Cycle does offer full service accounts in which we would have access.

Data Classification / Representation

Fuel Cycle does not represent or attest to data entered into its Services since 1) all data and account users are controlled by the customer, and 2) it does not know what data are being stored. Therefore, Fuel Cycle cannot classify data; it processes all data the same using industry best security measures designed to prevent unauthorized access and disclosure.

Assessment & Testing

Automated vulnerability scans are performed nightly with a commercial security provider named WhiteHat. Complete penetration tests are performed yearly by an independent security firm named NetraGard. If stipulated in the service contract with a confidentiality section, customers may request these documents once per year as required.

Data Destruction & Removal

Upon completion of the contract period the client can elect to have their data removed from the Fuel Cycle systems. This process will remove all of the panelist data, activity data and survey response data.



PRIVACY POLICIES

The Fuel Cycle online privacy policy covers the use and disclosure of personal information that may be collected anytime a user interacts with Fuel Cycle. Such interactions include visiting any of our web sites, using the Service, or when calling our sales and support departments. A detailed privacy statement is found at the www.FuelCycle.com site. In addition, the Terms of Use state acceptable policies regarding the Fuel Cycle Services.

How We Protect Your Information

Fuel Cycle takes preventative measures to protect all customer information, both programmatically and through employee training. All employees must attend yearly security awareness programs (covering privacy, security, and other policies) and sign confidentiality agreements. Security updates and reminders are sent to all employees quarterly.

Verification of Policies and Regulations

All policy verification is handled through the security and compliance departments. Fuel Cycle has established internal procedures to review, identify, and track compliance of policies, risk management objectives and regulatory issues.

Company Policies on the Web

Privacy, legal, and appropriate usage policies are at the bottom of nearly every Fuel Cycle web page. These are standard in the SaaS industry. The Terms of Service must be acknowledged by every Fuel Cycle end user, and uses common language to explain acceptable use of our Service. Any conflicting sections in a customer signed service agreement supersede the Terms of Service.

Personal Information and Data Privacy

Keeping Personally Identifiable Information (PII) and Protected Health Information (PHI) safe is an important topic with privacy officials these days. Countries around the world are creating their own policies, and not all align with the EU privacy directive. The U.S. is considering a nationwide PII law. But for now, most U.S. states have their own rules and regulations. Fuel Cycle protects all data the same, without regarding to type or classification, with the highest level of security systems and processes.

Safe Harbor

Fuel Cycle' privacy and data security policies are compliant with the guidelines of the European Union via the Safe Harbor Agreement. Any data transmitted to our U.S. data centers by a European customer/respondent is processed according to Safe Harbor laws (<http://export.gov/safeharbor/>).

CERTIFICATION / STANDARDS

Fuel Cycle creates general purpose software products whereby the customer owns and controls their data and users. Therefore, Fuel Cycle expressly disclaims any knowledge of the data input to its Services, and does not classify data; all data are considered highly confidential, treated equally, and protected using industry best security practices. An analogy is when a person rents a storage unit. The storage company does not know what is placed in that space (contents invisible). However, the company does have an obligation to provide adequate protection (security controls) so that no unauthorized person enters the premises (data center). And the unit owner must secure the unit with a strong lock (password and access controls). That is why Fuel Cycle cannot sign any document that requires us to perform in certain ways based upon specific data types defined by a customer or a government.

SOC 2 Type 2

Fuel Cycle Completes a SOC 2 Type 2 Audit Annually

Open Web Application Security Project

Fuel Cycle adheres to the OWASP ASVS methods for development and code review.



HR POLICIES

Fuel Cycle' rapid growth requires an influx of great talent. All new hires are held to rigorous standards of talent and proven track records. Fuel Cycle also requires background checks and adherence to strict privacy guidelines.

Policies

Upon hire, all Fuel Cycle employees are required to sign a privacy and confidentiality agreement that specifically addresses the risks of dealing with sensitive digital information. The policy includes the prohibition of access to customer data without customer permission. This permission is typically granted in the context of technical support for survey design. Any employee found to have violated this policy will be immediately terminated and legal action may result.

Provisioning Access

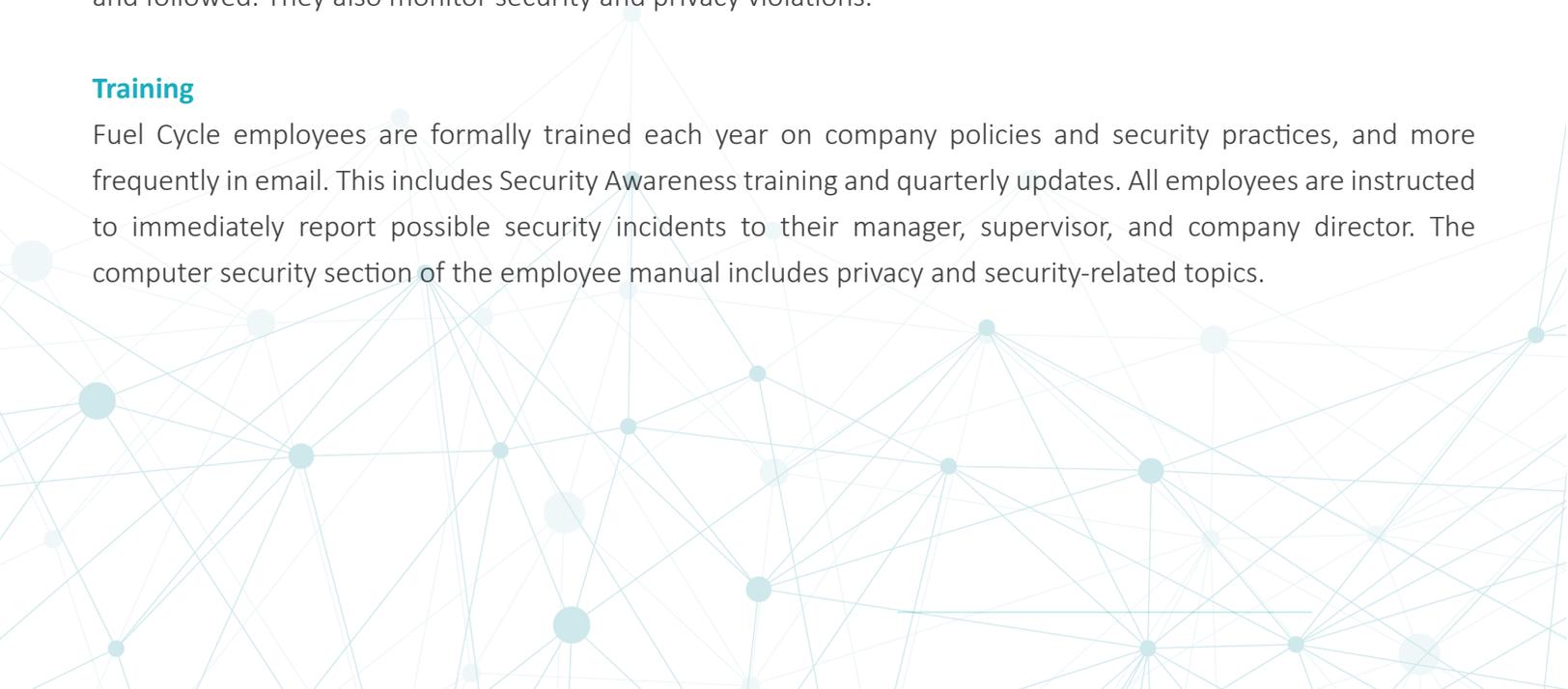
Practical access (different than granted access) to customer accounts is only given to those with a legitimate business need. This includes members of our support team, members of our engineering team for specific debugging issues, and select members of our sales teams that handle creating accounts for new customers. All system and service accesses are logged.

Fuel Cycle Security Team

The Fuel Cycle Security team comprises personnel from engineering, IT, HR, and legal departments. The Site Reliability Engineers are responsible for securing and monitoring hardware at the data centers. This includes router/firewall configuration, cage security, and reliability verification. We USE Amazon Web Services Internally, the IT department ensures workstation and local server security. HR is responsible for performing background/criminal employee checks. The Legal team ensures a safe work environment and that security plans are reviewed and followed. They also monitor security and privacy violations.

Training

Fuel Cycle employees are formally trained each year on company policies and security practices, and more frequently in email. This includes Security Awareness training and quarterly updates. All employees are instructed to immediately report possible security incidents to their manager, supervisor, and company director. The computer security section of the employee manual includes privacy and security-related topics.



NETWORK DESIGN, ACCESS & LOCATION

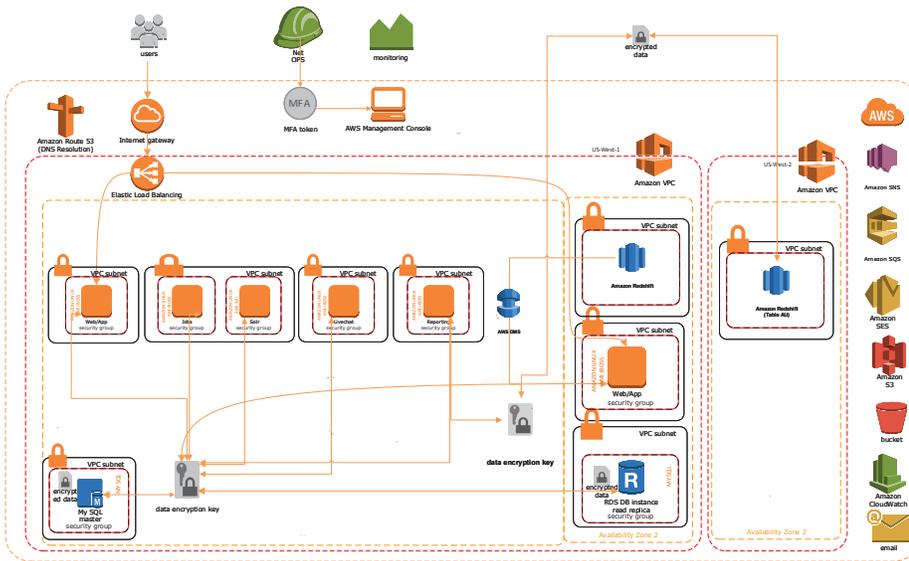
Data Flow and Network Diagram

In simple terms, transactions involve three parties—the customer, the respondents, and Fuel Cycle services. The diagram below shows the interaction between these parties. Respondents submit data using HTTPS (TLSv1.2 with AES 128/256 depending on browser) to the front-end web server (usually customername.passengerplatform.com). Data are processed by application servers and sent to database servers for storage. Web data are delivered to the respondent in the form of survey questions, graphics, and other content created in the survey design. Some surveys are restricted by password or location, as setup by the survey creator. This three-tiered architecture has

multiple layers of hardware and software security to ensure that no device/user can be inserted into the communication channel.

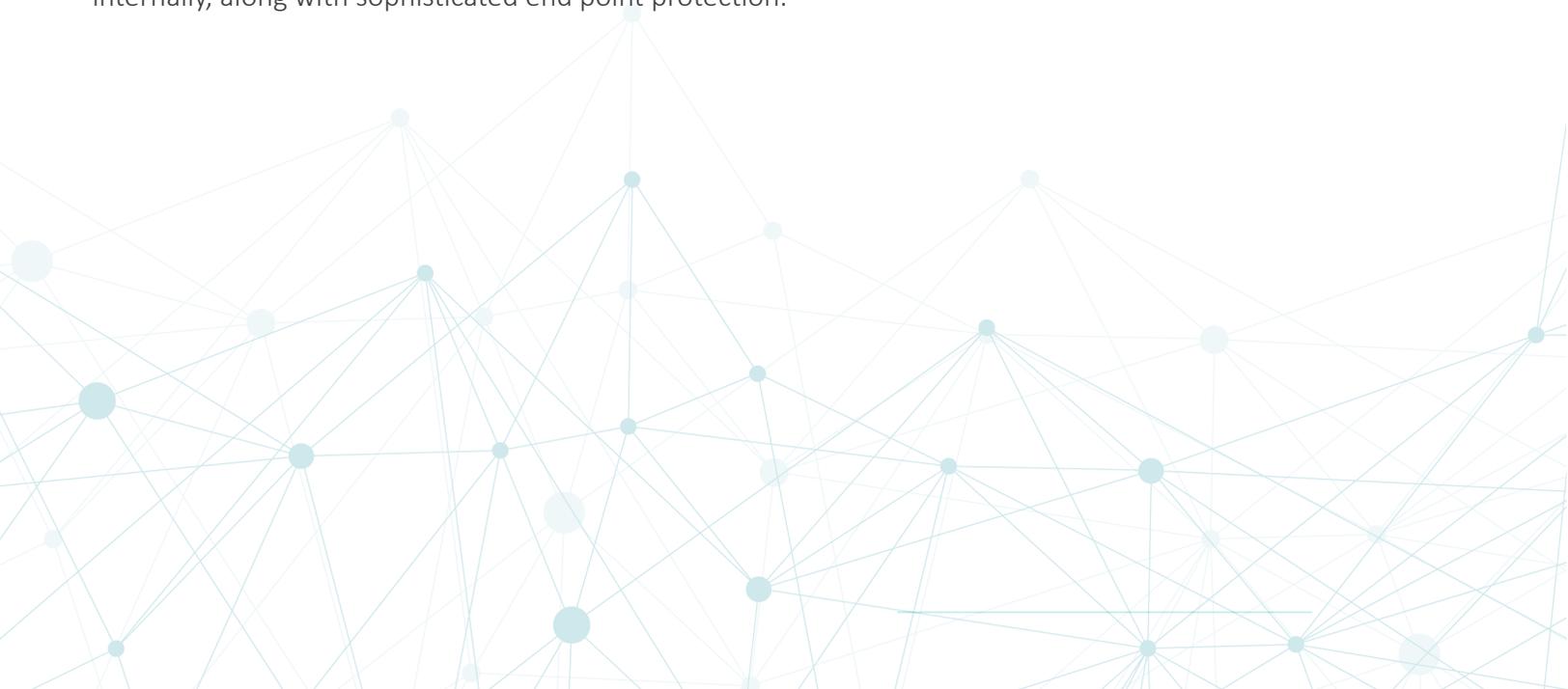
List of Physical Locations

Fuel Cycle hosts our Development, Staging and Production Servers in Amazon Web Services. The Data Centers with AWS are hosted in Multiple Zones both in Northern California and Virginia.



Keeping the Bad Guys Out

Fuel Cycle hosts all servers in AWS in a Virtual Private Cloud with no external access to servers except from within the Fuel Cycle office in LA. This access is controlled via MFA tokens and a VPN. We also utilize Palo Alto firewalls internally, along with sophisticated end point protection.



CORPORATE POLICY & CONTROLS

Fuel Cycle has policies that describe controls/procedures for changes, audits, and incidents. These controls are intended to minimize damage in the event of a disaster or service incident.

Change Management

Fuel Cycle strikes an interesting balance between controlling change and responding quickly to business needs. Though Fuel Cycle is a small company, we make nimble business decisions while maintaining our commitment to maintaining the highest standards as our products mature. Thus we have adopted the following base conditions:

- System uptime is most critical
- The system must scale as number of users and amount of data grow
- Features cannot break with a new code release

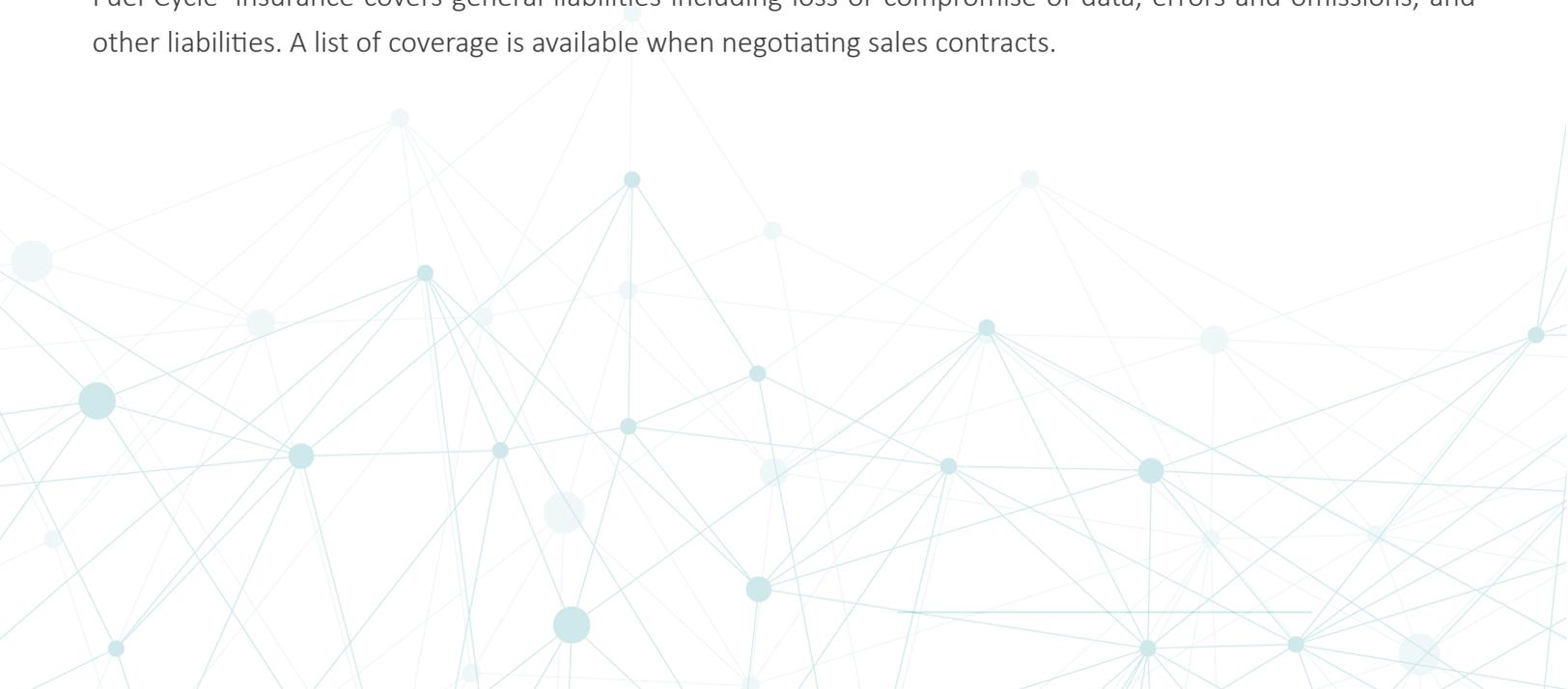
We conduct studies and perform analyses before any significant change is made. The API, for instance, can be expanded very quickly, but we're hesitant to change the way a particular request works. We maintain legacy requests when superseded by new requests.

Internal Network and Systems

Each component of our infrastructure (operating systems, workstations, routers, servers), both internal and in AWS, have baselines that include security settings and default applications. All employee data are stored on internal servers, and no customer data are allowed to be stored on the workstation's hard drive (by electronic and company policies).

Insurance

Fuel Cycle's insurance covers general liabilities including loss or compromise of data, errors and omissions, and other liabilities. A list of coverage is available when negotiating sales contracts.



PREVENTION OF UNAUTHORIZED ACCESS

There is nothing more important to Fuel Cycle than protecting customer data. Fuel Cycle has implemented innovative methods to prevent unauthorized access to data and the systems that host the data. It starts with having documented security baselines for every component located in the data center, and ends with reinforcing security throughout the organization.

User Roles in the Services

Fuel Cycle's services utilize sophisticated databases for the storage of customer data. To best optimize hardware and software, customers are segregated into different virtual areas within the databases. All data are encoded so that only the correct data will be sent to the requesting user. Access to data requires direct ownership (the user who created the survey) or indirectly with rights to the survey (e.g. Brand Admin).

Segregation of Data

These roles are found with the Fuel Platform. Other products have similar roles. More details may be found in the Fuel Platform Help Information

1. **Member**— A role that has access to log into the Fuel Community Platform to participate in the community, but they don't have access to any data or reports
2. **Client**— A role that access to the Fuel Community and Moderation Platform. They can participate in the Community and can also view data in the Moderation Platform, but not create content or members.
3. **Moderator**— Has all the same access as clients, but can create content, members and view member profile data.
4. **Super Moderator**— Has all the same access as the Moderator, but they are allowed to create and remove Moderators.



PREVENTION OF UNAUTHORIZED ACCESS CONTINUED

Mobile PIN Verification & 2 Factor Authentication

During recruitment and account signup we can enable mobile pin verification so that we can verify that the member signing up is an actual person and not a automated bot. If this is enabled it will ask the members for their mobile phone number and will ask them to type in the code they receive over SMS

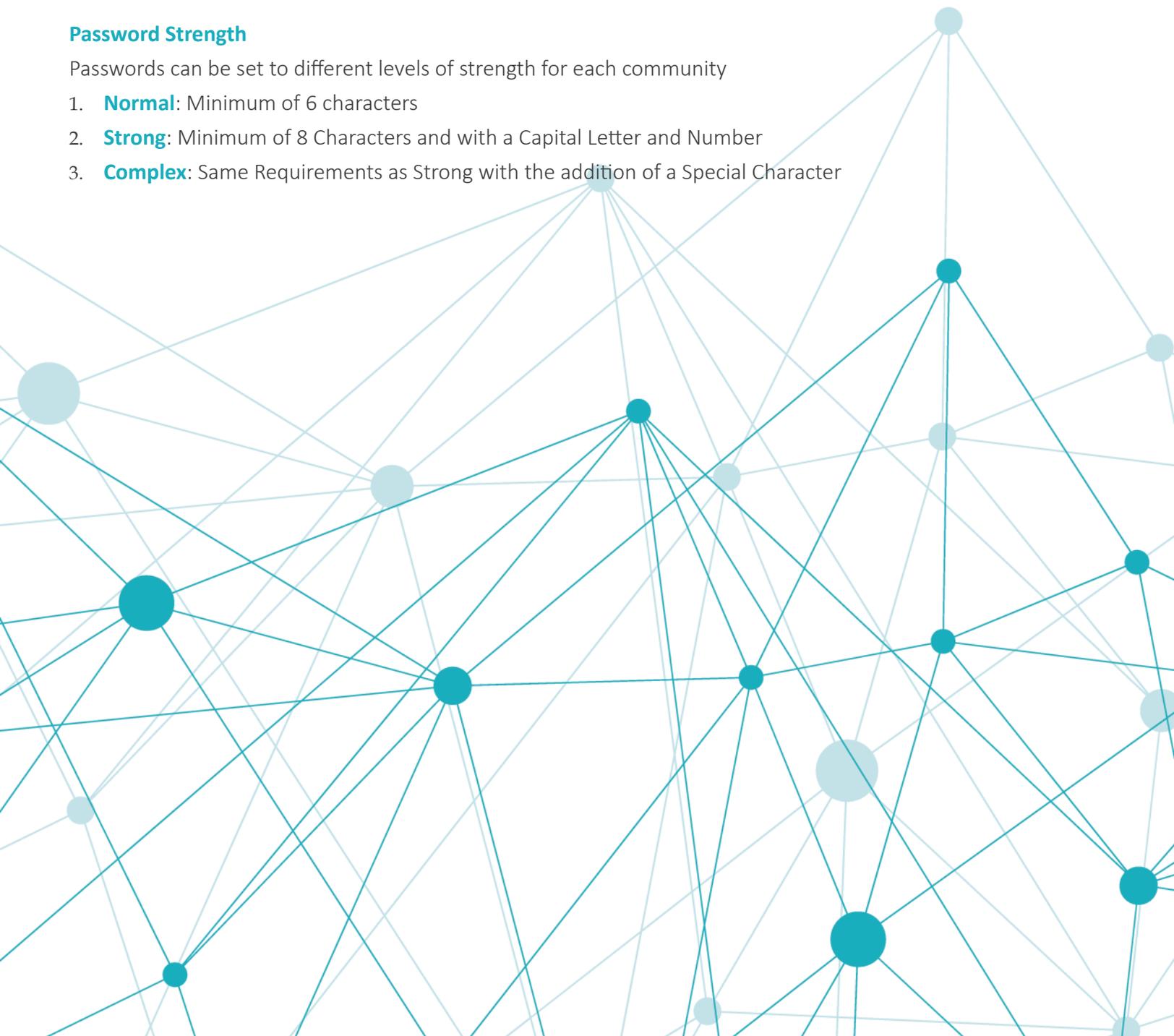
Email and IP Address Blocking

In some cases members will enter the community that are not good for overall community health. If this happens the Email and IP Address can be blocked

Password Strength

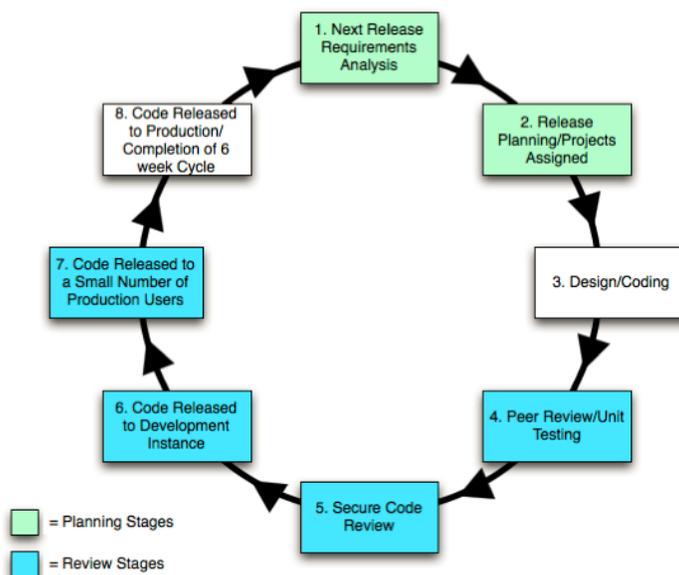
Passwords can be set to different levels of strength for each community

1. **Normal:** Minimum of 6 characters
2. **Strong:** Minimum of 8 Characters and with a Capital Letter and Number
3. **Complex:** Same Requirements as Strong with the addition of a Special Character



DEVELOPMENT PRACTICES

The security of a platform hinges on developing solid and secure code. Weak code makes for a weak product. Here, we'll discuss our development practices:



Data Flow and Network Diagram

Fuel Cycle uses an agile development model. This means that we take an iterative approach to software development and remain nimble in responding to the needs of our customers. Code is released on a one-week cycle that includes new features, bug fixes, and upgrades. Each cycle includes comprehensive security checks to ensure that the code is vulnerability free. These checks include automated software assessments, peer and managerial reviews. The Software Development Life Cycle (SDLC) is shown below in the diagram

Segregation of Responsibilities

There are distinct Fuel Cycle programming teams, and each team is responsible for specific areas of the production. Engineers may only develop code in their area. This ensures a more secure and reliable development environment.

DISASTER RECOVERY

This section describes the Disaster Recovery Plan (DRP, that includes Data Loss Prevention or DLP) that the company will follow in the event of a disaster that would affect our data or operations. A detailed internal document is used by engineers that contains specific details building, testing, and responding to disasters. The purpose of the Disaster Recovery Plan is to ensure prompt and complete return to normalcy in the event of a service-affecting disaster. The objectives of this plan are to ensure that 1) in event of disaster, usability is restored promptly with little to no disruption for the end user, and 2) in the event of disaster, data loss is avoided through extensive backup measures. Disaster recovery and business continuity plans are tested at least annually.



BUSINESS CONTINUITY

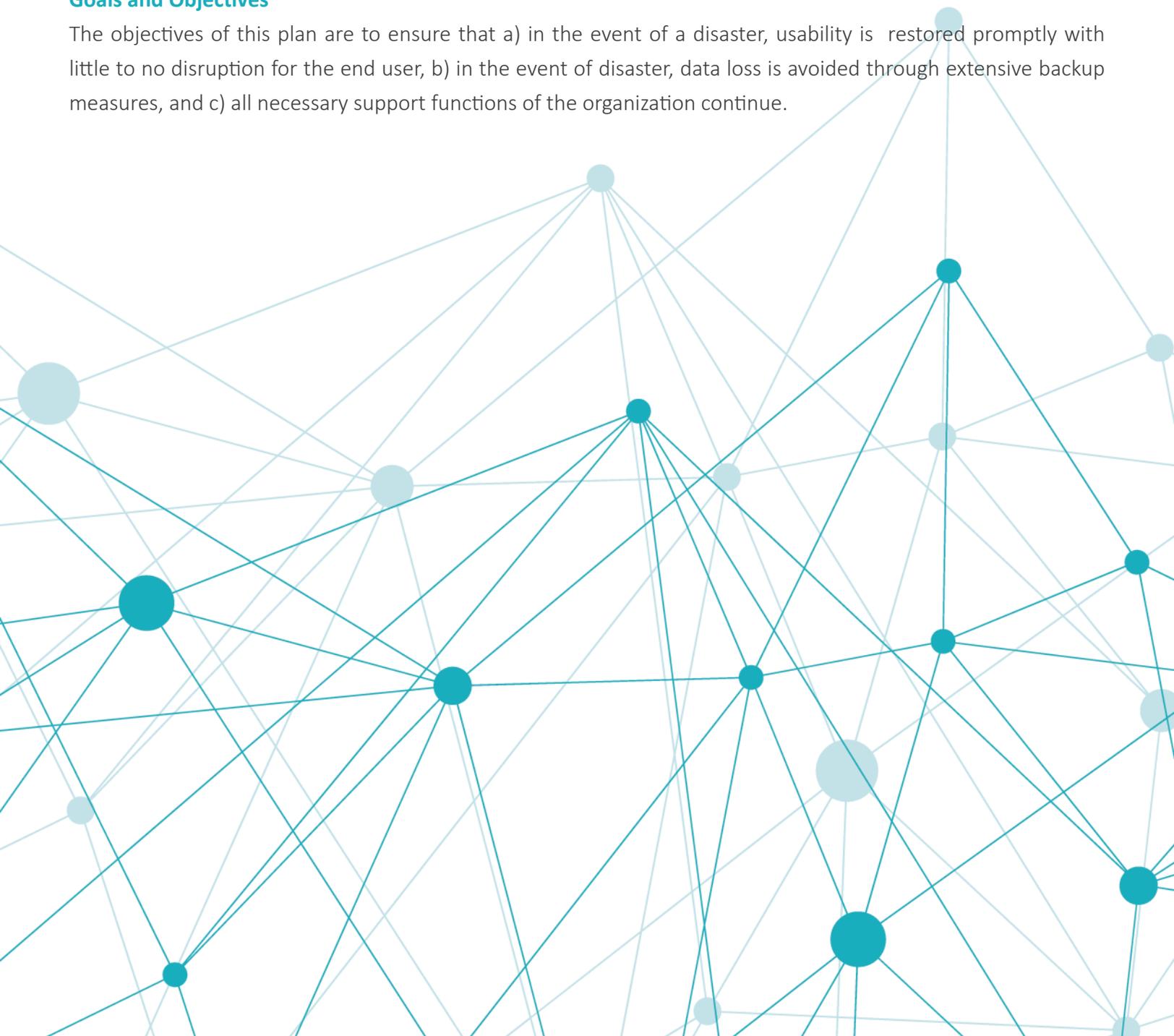
Fuel Cycle has a detailed Business Continuity plan in event of a disaster. Though details of the plan are internal, below is a summary of how key business operations will operate following a disaster. This information supplements the information above in the Disaster Recovery section.

Purpose

The purpose of this business continuity plan is to ensure prompt and complete return to normalcy in the event of a service-affecting disaster.

Goals and Objectives

The objectives of this plan are to ensure that a) in the event of a disaster, usability is restored promptly with little to no disruption for the end user, b) in the event of disaster, data loss is avoided through extensive backup measures, and c) all necessary support functions of the organization continue.



FUEL CYCLE SECURITY FAQ

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