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DC BLOX, Inc.

Type 2 SOC 3

2022

DC BLOX

SOC 3 FOR SERVICE ORGANIZATIONS REPORT

August 1, 2021 to July 31, 2022

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SECTION 1

ASSERTION OF DC BLOX, INC. MANAGEMENT

ASSERTION OF DC BLOX, INC. MANAGEMENT

September 1, 2022

We are responsible for designing, implementing, operating, and maintaining effective controls within DC BLOX, Inc.'s ('DC BLOX' or 'the Company') Data Center Hosting and Client Portal Services System throughout the period August 1, 2021 to July 31, 2022, to provide reasonable assurance that DC BLOX's service commitments and system requirements relevant to Security and Availability (applicable trust services criteria) were achieved. Our description of the boundaries of the system is presented below in "DC BLOX, Inc.'s Description of Its Data Center Hosting and Client Portal Services System throughout the period August 1, 2021 to July 31, 2022" and identifies the aspects of the system covered by our assertion.

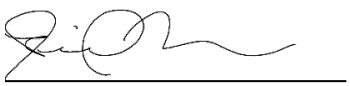
We have performed an evaluation of the effectiveness of the controls within the system throughout the period August 1, 2021 to July 31, 2022, to provide reasonable assurance that DC BLOX's service commitments and system requirements were achieved based on the trust services criteria relevant to Security and Availability (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*). DC BLOX's objectives for the system in applying applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria. The principal service commitments and system requirements related to the applicable trust services criteria are presented in "DC BLOX, Inc.'s Description of Its Data Center Hosting and Client Portal Services System throughout the period August 1, 2021 to July 31, 2022".

DC BLOX uses Weiser Security Services ('Weiser' or 'subservice organization') to provide physical security and monitoring services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at DC BLOX, to achieve DC BLOX's service commitments and system requirements based on the applicable trust services criteria. The description presents DC BLOX's controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of DC BLOX's controls. The description does not disclose the actual controls at the subservice organization.

The description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary to achieve DC BLOX's service commitments and system requirements based on the applicable trust services criteria. The description presents the applicable trust services criteria and the complementary user entity controls assumed in the design of DC BLOX's controls.

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 August 1, 2021 to July 31, 2022 to provide reasonable assurance that DC BLOX's service commitments and system requirements were achieved based on the applicable trust services criteria.



Dave M. Brown
Director, Security and Compliance
DC BLOX, Inc.

SECTION 2

INDEPENDENT SERVICE AUDITOR'S REPORT

INDEPENDENT SERVICE AUDITOR'S REPORT

To DC BLOX, Inc.:

Scope

We have examined DC BLOX, Inc.'s ('DC BLOX' or 'the Company') accompanying description of Data Center Hosting and Client Portal Services System titled "DC BLOX, Inc.'s Description of Its Data Center Hosting and Client Portal Services System throughout the period August 1, 2021 to July 31, 2022" (description) based on the criteria for a description of a service organization's system in DC section 200, *2018 Description Criteria for a Description of a Service Organization's System in a SOC ® Report* (AICPA, *Description Criteria*), (description criteria) and the suitability of the design and operating effectiveness of controls stated in the description throughout the period August 1, 2021 to July 31, 2022, to provide reasonable assurance that DC BLOX's service commitments and system requirements were achieved based on the trust services criteria relevant to Security and Availability (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*).

DC BLOX uses Weiser to provide physical security and monitoring services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at DC BLOX, to achieve DC BLOX's service commitments and system requirements based on the applicable trust services criteria. The description presents DC BLOX's controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of DC BLOX's controls. The description does not disclose the actual controls at the subservice organization. Our examination did not include the services provided by the subservice organization, and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at DC BLOX, to achieve DC BLOX's service commitments and system requirements based on the applicable trust services criteria. The description presents DC BLOX's controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of DC BLOX's controls. Our examination did not include such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such controls.

Service Organization's Responsibilities

DC BLOX 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 DC BLOX's service commitments and system requirements were achieved. DC BLOX has provided the accompanying assertion titled "Assertion of DC BLOX, Inc. Management" (assertion) about the description and the suitability of design and operating effectiveness of controls stated therein. DC BLOX is also responsible for preparing the description and assertion, including the completeness, accuracy, and method of presentation of the description and assertion; providing the services covered by the description; selecting the applicable trust services criteria and stating the related controls in the description; and identifying the risks that threaten the achievement of the service organization's service commitments and system requirements.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the description and on the suitability of design and operating effectiveness of controls stated in the description based on our examination. 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, in all material respects, the description is presented in accordance with the description criteria and the controls stated therein were suitably designed and operated effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of the description of a service organization's system and the suitability of the design and operating effectiveness of controls involves the following:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements
- Assessing the risks that the description is not presented in accordance with the description criteria and that controls were not suitably designed or did not operate effectively
- Performing procedures to obtain evidence about whether the description is presented in accordance with the description criteria
- Performing procedures to obtain evidence about whether controls stated in the description were suitably designed to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria
- Testing the operating effectiveness of controls stated in the description to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria
- Evaluating the overall presentation of the description

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

Independence and Ethical Responsibilities

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the examination engagement.

Inherent Limitations

The description is prepared to meet the common needs of a broad range of report users and may not, therefore, include every aspect of the system that individual users may consider important to meet their informational needs.

There are inherent limitations in the effectiveness of 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 are achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the suitability of the design and operating 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 or procedures may deteriorate.

Opinion

In our opinion, management's assertion that the controls within DC BLOX's Data Center Hosting and Client Portal Services System were suitably designed and operating effectively throughout the period August 1, 2021 to July 31, 2022, to provide reasonable assurance that DC BLOX's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

The SOC logo for Service Organizations on DC BLOX's website constitutes a symbolic representation of the contents of this report and is not intended, nor should it be construed, to provide any additional assurance.

Restricted Use

This report, is intended solely for the information and use of DC BLOX, user entities of DC BLOX's Data Center Hosting and Client Portal Services during some or all of the period August 1, 2021 to July 31, 2022, business partners of DC BLOX subject to risks arising from interactions with the Data Center Hosting and Client Portal Services, and those who have sufficient knowledge and understanding of the complementary user entity controls and complementary subservice organization controls and how those controls interact with the controls at the service organization to achieve the service organization's service commitments and system requirements.

This report is not intended to be, and should not be, used by anyone other than these specified parties.

A-LIGN ASSURANCE

Tampa, Florida
September 1, 2022

SECTION 3

DC BLOX, INC.'S DESCRIPTION OF ITS DATA CENTER HOSTING AND CLIENT PORTAL SERVICES SYSTEM THROUGHOUT THE PERIOD AUGUST 1, 2021 TO JULY 31, 2022

OVERVIEW OF OPERATIONS

Company Background

DC BLOX was founded in 2014 with the objective of providing high-performance data center, network and related services to Tier 2 markets. DC BLOX customers can realize lower infrastructure costs, increased agility to expand, lower network latency and higher infrastructure reliability. These benefits are delivered via a concurrently maintainable modular data center design that brings higher efficiency of operation connected via a fully redundant private optical network created to offer high-capacity performance and resiliency. The organization is based in Atlanta, Georgia, with data center locations in Chattanooga, Tennessee; Huntsville, Alabama; Birmingham, Alabama; Atlanta, Georgia; and Greenville, South Carolina.

Industries served by DC BLOX include Manufacturing, Media Services, Telecommunications, Consulting, IT Services, Advertising, Healthcare, Educational institutions, and Government agencies.

Description of Services Provided

DC BLOX provides a full suite of data center colocation, interconnection, and carrier grade connectivity services.

Data Center Services

DC BLOX provides data center services that can be configured to meet each specific client's needs. Clients are able to request full cabinet, and half cabinet colocation space in power densities ranging from 2kW up to 8kW. Customers with certain power requirements may have the option for a wholesale arrangement which enables the customer to sign a long-term lease and reserve larger amounts of power at utility rates. DC BLOX also provides "Smart Hands" through the data center operations which will perform rudimentary tasks on behalf of the customer without the customer having to travel to the data center.

Interconnection

DC BLOX provides the ability for customers to interconnect with various carrier service providers that are tenants in the data center. Customers request cross connects and DC BLOX provides and manages the physical connections for customers. DC BLOX also provides virtual cross-connects to interconnect with carriers built-in to remote DC BLOX data centers.

Carrier Grade Network Services

Through DC BLOX's fiber optic network customers can opt for Dedicated Internet Access, Ethernet Private Lines and Ethernet Transport. Dedicated Internet Access is fully protected and redundant to deliver high reliability. All Ethernet Private Line services are full protected through redundant fiber routes. Ethernet Transport can be delivered protected or unprotected. Ethernet services can be Metro or Long Haul.

Customer Support

DC BLOX Customer Portal provides customers with real time management of DC BLOX Cloud Storage Services, services related to customer requests such as physical access to their racks and remote hands support of their equipment. All portal hosting is onsite in DC BLOX data centers.

Principal Service Commitments and System Requirements

DC BLOX designs its processes and procedures to meet its objectives for its Data Center Hosting Services. Those objectives are based on the service commitments that DC BLOX makes to user entities, the laws and regulations that govern the provision of Data Center Hosting Services, and the financial, operational, and compliance requirements that DC BLOX has established for the services. The Data Center Hosting Services of DC BLOX adhere to the security and privacy requirements of the Health Insurance Portability and Accountability Act Administrative Simplification, as amended, including relevant regulations, as well as state privacy security laws and regulations in the jurisdictions in which DC BLOX operates.

Security commitments to user entities are documented and communicated in Service Level Agreements (SLAs) and other customer agreements, as well as in the description of the service offering provided online. Security commitments are standardized and include, but are not limited to, the following:

- Security principles are designed to permit system users to access the information they need based on their role in the system while restricting them from accessing information not needed for their role
- Use of encryption technologies to protect customer data both at rest and in transit

DC BLOX establishes operational requirements that support the achievement of security commitments, relevant laws and regulations, and other system requirements. Such requirements are communicated in DC BLOX'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 around how the service is designed and developed, how the system is operated, how the internal business systems and networks are managed and how 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.

Components of the System

Infrastructure

Primary infrastructure used to provide DC BLOX's Data Center Hosting and Client Portal Services System includes the following:

Primary Infrastructure		
Hardware	**Type**	**Purpose**
Routers	Juniper MX-240 Juniper MX-204	Upstream Internet connectivity and Border Gateway Protocol (BGP) routing
Switches	Ciena 8700 Ciena 6500 Ciena 3900 Ciena 5142 Ciena 5160 Ciena 5164 Ciena 5170 Juniper EX3400 Juniper EX4600	Core network routing and network port capacity
Firewalls	Fortinet Virtual Machine (VM) 64-HV	Restricts traffic to and from internal and management networks, as well as providing Virtual Private Network (VPN) services

Software

Primary software used to provide DC BLOX's Data Center Hosting and Client Portal Services System includes the following:

Primary Software		
Software	**Operating System**	**Purpose**
Altaro VM Backup	Windows Server 2016 Windows Server 2019	Backups of virtual machines used to monitor and manage production networks
Cacti	CentOS 7.9	Network performance monitoring, historical, and trending analysis
Ciena OneControl	Oracle Linux	Management of all Ciena network equipment
Microsoft Hyper-V	Windows Server 2016 Windows Server 2019	Virtualization platform
Nagios	Ubuntu 16.04.7 LTS	Network health monitoring and alerting
VT Scada	Windows Server 2016 Windows Server 2019	Data center facilities and environmental monitoring and alerting

People

DC BLOX personnel support the above services in each of the following functional areas:

- Technology - Manages technology infrastructure and the development of new and existing products. Identify opportunities and risks for the business. Manage Research and Development (R&D). Communicate the company's technology strategy to partners, management, investors and employees. Maintain current information about technology standards and compliance regulations
- Operations - Data center operations include all processes and operations performed within a data center. There are several functional areas with data center operations:
    - Infrastructure Operations: Installing, maintaining, monitoring, patching and updating server, storage and network resources
    - Power and cooling: All processes that ensure enough power is supplied to the data center facility and the cooling system is operational
    - Management: Creation, enforcement and monitoring of policies and procedures within data center processes
- Network Strategy - Network strategy ensures the operation of the networking infrastructure, including the following:
    - Commissioning, Provisioning and Operations of all Network Elements, Element Management Systems, and Network Management Systems across the entire DC BLOX footprint and infrastructure
    - This includes the DC BLOX private Optical Transport Network, Layer2/Ethernet Service Delivery Network, and IP Transit Network Support for the DC BLOX's Network Operations Center (NOC)
- Sales - Identifies business opportunities by identifying prospects and evaluating their position in the industry; researching and analyzing sales options. Sells products by establishing contact and developing relationships with prospects; recommending solutions. Maintains relationships with clients by providing support, information, and guidance; researching and recommending new opportunities; recommending profit and service improvements. Identifies product improvements or new products by remaining current on industry trends, market activities, and competitors

- Data Center Engineering - Data center engineering includes optimizing the performance of DC BLOX's data center from an infrastructure perspective. Data Center Engineering is also responsible for helping locate and build out new data centers. This involves designing, engineering and overseeing the building of new data centers
- Product/Marketing - Product Marketing is responsible for developing positioning, messaging, competitive differentiation, and enabling the Sales and Marketing teams to ensure they are aligned and work efficiently to generate and close opportunities. Product Marketing is strategic marketing at the product or product line level
- Service Delivery - Service Delivery is responsible for the principles, standards, policies and constraints to be used to guide the design, development, deployment, operation and retirement of services delivered by a service provider with a view to offering a consistent service experience to the Data Center user community
- Security and Compliance - Accountable for the building, managing and implementing controls, processes, and procedures related to securing the facilities, infrastructure, network and data for DC BLOX. Compliance: Responsible for ensuring all controls are being met in accordance with compliance guidelines and prepare for and complete audits for compliance programs. Security: Processes, tools and technologies that ensure physical and logical security in the data center premises. Day to day security operations and log review of equipment throughout the company to maintain security of company

Data

DC BLOX does not directly interact with customer data, but rather provides a secure, reliable environment for customers to store their systems and data.

Processes, Policies and Procedures

DC BLOX has established formal policies and procedures exist that describe physical security, logical access, computer operations, change control, and data communication standards. All teams are expected to adhere to the DC BLOX policies and procedures that define how services should be delivered. These are located on the company's SharePoint and can be accessed by any DC BLOX team member.

Physical Security

Wholly occupied facilities are protected by fencing around the entire perimeter. Each wholly occupied facility has a designated reception area which is attended 24 hours per day by a security guard.

In multi-tenant facilities such as Atlanta, access to the reception area is unlocked from 8am to 5pm on business days and is locked at all other times. The door may be unlocked through the use of an access card/ID that has been granted general access to the facility. Access beyond the reception area and into the data center is further restricted by the access card system and monitored by on site security personnel. All remaining exterior ingress doors are restricted to users possessing an access card/ID that has been granted access to use the door.

Each facility utilizes high definition video surveillance systems to monitor all activity around and inside the data center. Video is stored for a minimum of 120 days.

Each exterior door or door into a restricted area within the facility is assigned to a door zone, which is used by the access card/ID system to control access. Access to zones is restricted through the use of access control lists. Employees and vendors granted access cards are assigned to roles based on their responsibilities and business justification for access.

Visitors are required to check in with the security guard in the data center entrance. Visitors must present a valid, government-issued photo ID prior to being granted any data center access. The visitor's name, employer, and purpose for visit are recorded in a visitor log, and their visit must be approved by a DC BLOX employee who is authorized to sign non-employees into the facility. The visitor will be issued a temporary ID badge to be worn throughout their visit. This temporary badge does not permit access through any secured doors within the facility.

Data centers entrances are controlled by a combination of two doors; access through the exterior door is gained by using a key card to deactivate the locking mechanism, and access through the interior door is granted by using a personal identification number (PIN).

Upon an employee's termination of employment, Human Resources (HR) generates an employee termination request on the last day of employment. This record is routed to the access administrators for deletion. In addition, terminated employees turn over their access cards/IDs during their exit interview. These cards are then returned to security guards at each location for deactivation and destruction.

On a quarterly basis, the Operations Director works with individual Facility Managers to review access to the secure zones of the data center. Any required changes are addressed through the service request system and changes are made, as necessary.

Environmental Security

DC BLOX's data center facilities include several environmental safeguards including:

- Atlanta:
    - Power:
        - Network underground utility power
        - Two 1 MW generators
        - 36 hours on-site fuel storage
        - Redundant 500kVA UPS Modules
    - Cooling:
        - Redundant air-cooled chillers
        - Liebert cold aisle containment
    - Fire detection and prevention:
        - FM-200 fire suppression system
        - VESDA smoke detection
        - Handheld fire extinguishers
- Birmingham:
    - Power:
        - Up to 5MW critical load; expandable up to 60MW
        - N+1 generator backup
        - N+1 UPS systems
        - Dual UPS feeds to all cabinets
        - 24-hour on-site fuel storage
    - Cooling:
        - N+1 cooling
        - Hot aisle containment
        - High efficiency Direct Expansion (DX)
    - Fire detection and prevention:
        - Pre-action fire suppression systems
        - VESDA smoke detection
        - Handheld fire extinguishers
        - Hydrogen sensors in the UPS rooms

- Chattanooga:
  - Power:
    - Up to 1MW critical load; expandable up to 3.5MW
    - Dual 1600 Amp Smart Grid Utility Service
    - Automatic Utility Transfer Switch fed from diverse substations
    - Dual UPS feeds to all cabinets
    - 36-hour on-site fuel storage
    - N+N generator backup
    - N+N UPS systems
  - Cooling:
    - N+1 cooling
    - Hot aisle containment
    - 280 Ton air-cooled chiller plant
    - 240 Ton high efficiency dry cooler plant
  - Fire detection and prevention:
    - Pre-action fire suppression systems
    - VESDA smoke detection
    - Handheld fire extinguishers
- Huntsville:
  - Power:
    - Up to 1.5MW critical load; expandable up to 13.5MW
    - N+1 generator backup
    - N+1 UPS systems
    - Dual UPS feeds to all cabinets
    - Dual transformers
    - 24-hour on-site fuel storage
  - Cooling:
    - N+1 cooling
    - High-efficiency Direct Expansion (DX)
    - Hot aisle containment
  - Fire detection and prevention:
    - Pre-action fire suppression systems
    - VESDA smoke detection
    - Handheld fire extinguishers
- Greenville:
  - Power:
    - Up to 3MW critical load in phase 1; expandable up to 18MW
    - N+1 generator backup
    - N+1 UPS systems
    - Dual UPS feeds to all cabinets
    - Dual transformers
    - 24-hour on-site fuel storage
  - Cooling:
    - N+1 cooling
    - High-efficiency Direct Expansion (DX)
    - Hot aisle containment
  - Fire detection and prevention:
    - Pre-action fire suppression systems
    - VESDA smoke detection
    - Handheld fire extinguishers

Environmental safeguards are monitored continuously by DC BLOX data center operations teams utilizing Supervisory Control and Data Acquisition (SCADA) and Building Management System (BMS) systems.

Logical Access

DC BLOX uses role-based security architecture and requires users of the system to be identified and authenticated prior to the use of any system resources. Resources are protected through the use of native system security and add-on software products that identify and authenticate users and validate access requests against the users' authorized roles. In situations in which incompatible responsibilities cannot be segregated, DC BLOX implements monitoring of one or more of the responsibilities.

All resources are included in the asset inventory system and Operations Management is responsible for maintaining an accurate up-to-date list.

Employees and approved vendor personnel connect to DC BLOX system resources using an Active Directory user ID and password. Connections to network equipment are validated using native user authentication. Passwords must conform to defined password standards and are enforced through parameter settings in Active Directory or administrative policy for network equipment. Active Directory password settings are part of the configuration standards and force users to change passwords at a defined interval, disable the user ID's ability to access the system and components after a specified number of unsuccessful access attempts, and requiring reentry of the user ID and password after a period of inactivity on production servers. Employees accessing the system from outside the DC BLOX network are required to use a VPN system that is integrated into Active Directory.

Upon hire, employees are assigned to a position in the HR management system. Prior to the employees' start date, HR generates a list of the employee user IDs to be created and access to be granted. The report is used by administrators to create user IDs and assign access rules. Access rules have been pre-defined based on the defined roles.

On a quarterly basis, access to production systems, networks, and environments is reviewed by system administrators and data center managers. In evaluating role access, group members consider job descriptions, duties requiring segregation, and risks associated with access. Administrators present results to Operations Management and Security/Compliance for review, and any required changes are indicated and implemented immediately, within the confines of DC BLOX's change management process.

HR generates a list of terminated employees upon any termination. This report is used by system administrators and the Operations team to immediately disable or delete employee access.

Computer Operations - Backups

DC BLOX maintains a backup and recovery system that enables the company to restore any lost data from its production network, management, and monitoring systems. Data is backed up and secured to storage systems located at an alternate DC BLOX data center and protected in locations that are logically separated from the rest of the network. Operations personnel receive notifications of all backup tasks and respond immediately in the event of backup failures.

Computer Operations - Availability

Incident response policies and procedures are in place to guide personnel in reporting and responding to information technology incidents. Procedures exist to identify, report, and act upon system security breaches and other incidents. Incident response procedures are in place to identify and respond to incidents on the network.

DC BLOX monitors the capacity utilization of physical space, environmental control systems, network infrastructure, and network links to ensure that service delivery matches SLAs. DC BLOX evaluates the need for additional capacity in response to growth of existing customers, the addition of new customers, and business development targets. Infrastructure capacity monitoring includes, but is not limited to, the following infrastructure:

- Data center space, power, redundant power, and cooling

- Network equipment resources (ports, Central Processing Unit (CPU), memory, etc.)
- Network bandwidth

DC BLOX has implemented a patch management process to ensure infrastructure systems are patched in accordance with vendor recommended operating system patches. The DC BLOX Operations team and system owners work cooperatively to review proposed patches to determine whether the patches are applied. System owners and Operations are responsible for determining the risk of applying or not applying patches based upon the security and availability impact of those systems and any critical applications hosted on them. DC BLOX staff validate that all patches or updates have been installed and, if applicable, that reboots have been completed, and that the systems are still performing as expected.

The in-scope system is supported by Weiser Security Services. As such, Weiser is responsible for ensuring the physical security of DC BLOX's in-scope system and monitoring the availability of the in-scope services. Refer to the 'Subservice Organization' section below for additional information.

Change Control

DC BLOX maintains a formal Change Management Policy to guide personnel in documenting and implementing system changes. Changes to network connectivity, virtual infrastructure, virtual servers, physical servers, patching, financial systems, file servers, camera systems, cameras, access control, UPS, Generator, PDU, fire suppression, storage, load balancers, system updates, provisioning and decommissioning activities are in scope for change control procedures.

Change management procedures include change request and initiation processes, documentation requirements, testing requirements, and required approval procedures.

A ticketing system is utilized to document the change management procedures for system and infrastructure changes. Management approves changes prior to implementation in the production environment and documents those approvals within the ticketing system.

Data Communications

Firewall systems are in place to filter unauthorized inbound network traffic from the Internet to management and administrative networks. Network address translation (NAT) functionality is utilized to manage internal IP addresses. Administrative access to the firewall is restricted to authorized employees and internal IP ranges.

Redundant virtual infrastructure clusters are used on all production facing data center server environments to help ensure there are no single points of failure on the production facing management, monitoring, and backup systems.

Redundancy is built into all physical connections providing intra data center connectivity services and all other external facing network customer services. There is no single point of failure on the network fiber infrastructure between data centers, helping to ensure the connections providing Internet access to customers stay online.

The data center switching infrastructure connecting colocation services are fully redundant up to the customer equipment (if equipped). Redundant network connectivity services are an option.

Vulnerability scanning is performed using a third-party vendor on a monthly basis in accordance with DC BLOX policy. The vendor uses industry standard scanning technologies which is combined with a formal methodology specified by DC BLOX. Scans are performed during non-peak hours following maintenance windows. The installation of tools or other software on DC BLOX systems are implemented within the confines of the Change Management process. Scanning is performed with approved scanning templates and with bandwidth-throttling options enabled.

Authorized employees may access the production infrastructure through from the Internet through the use of VPN technology. Access to the production infrastructure is tightly controlled.

Boundaries of the System

The scope of this report includes the DC BLOX Data Center Hosting and Client Portal Services System performed in the Chattanooga, Tennessee; Huntsville, Alabama; Birmingham, Alabama; Atlanta, Georgia; and Greenville, South Carolina facilities.

This report does not include the physical security and monitoring services provided by Weiser Security Services at DC BLOX's in-scope facilities.

Changes to the System Since the Last Review

The scope change includes an additional location for the Data Center Hosting and Client Portal Services System performed in the Greenville, South Carolina facility.

Incidents Since the Last Review

No significant incidents have occurred to the services provided to user entities since the organization's last review.

Criteria Not Applicable to the System

All Common/Security and Availability criteria were applicable to the Data Center Hosting and Client Portal Services System.

This report does not include the physical security and monitoring services provided by Weiser Security Services at DC BLOX's in-scope facilities.

Subservice Description of Services

Weiser Security Services handles data center security guard services and monitoring of DC BLOX CCTV systems.

Complementary Subservice Organization Controls

DC BLOX's services are designed with the assumption that certain controls will be implemented by the subservice organization. Such controls are called complementary subservice organization controls. It is not feasible for all of the trust services criteria related to DC BLOX's services to be solely achieved by DC BLOX control procedures. Accordingly, the subservice organization, in conjunction with the services, should establish their own internal controls or procedures to complement those of DC BLOX.

The following subservice organization controls should be implemented by Weiser Security Services to provide additional assurance that the trust services criteria described within this report are met:

Subservice Organization - Weiser Security Services		
Category	**Criteria**	**Control**
Common Criteria / Security	CC6.4, CC7.2	Video surveillance of the data centers is monitored continuously by security guards.
		Security guards monitor other data center facilities video surveillance system while the guard at that location is on patrol.
		Security guards patrol the data center facilities.

Subservice Organization - Weiser Security Services		
Category	**Criteria**	**Control**
		Security guards check visitor's ID's before access is granted to the facilities.
		Security guards alert DC BLOX facility and data center managers if they encounter something out of the ordinary.

DC BLOX management, along with the subservice organization, define the scope and responsibility of the controls necessary to meet all the relevant trust services criteria through written contracts, such as SLAs. In addition, DC BLOX performs monitoring of the subservice organization controls, including the following procedures:

- Reviewing attestation reports over services provided by vendors and the subservice organization
- Monitoring external communications, such as customer complaints relevant to the services by the subservice organization

COMPLEMENTARY USER ENTITY CONTROLS

DC BLOX's services are designed with the assumption that certain controls will be implemented by user entities. Such controls are called complementary user entity controls. It is not feasible for all of the Trust Services Criteria related to DC BLOX's services to be solely achieved by DC BLOX control procedures. Accordingly, user entities, in conjunction with the services, should establish their own internal controls or procedures to complement those of DC BLOX.

The following complementary user entity controls should be implemented by user entities to provide additional assurance that the Trust Services Criteria described within this report are met. As these items represent only a part of the control considerations that might be pertinent at the user entities' locations, user entities' auditors should exercise judgment in selecting and reviewing these complementary user entity controls.

1. User entities are responsible for understanding and complying with their contractual obligations to DC BLOX.
2. User entities are responsible for notifying DC BLOX of changes made to technical or administrative contact information.
3. User entities are responsible for maintaining their own system(s) of record.
4. User entities are responsible for ensuring the supervision, management, and control of the use of DC BLOX services by their personnel.
5. User entities are responsible for developing their own disaster recovery and business continuity plans that address the inability to access or utilize DC BLOX services.
6. User entities are responsible for providing DC BLOX with a list of approvers for security and system configuration changes for data transmission.
7. User entities are responsible for immediately notifying DC BLOX of any actual or suspected information security breaches, including compromised user accounts, including those used for integrations and secure file transfers.
8. User entities are responsible for properly disposing of data, software, and infrastructure components.