

The Protection of Client Data

Pershing LLC (Pershing), a BNY Mellon company, has been a leading global provider of financial business solutions for over 75 years and serves many of the world's most respected financial organizations. We remain committed to the protection of client data.

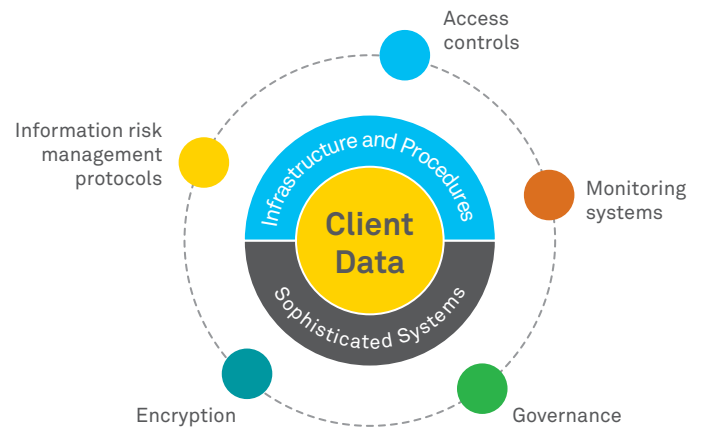
- › The protection of client data is a critical part of our responsibility to protect client assets. Pershing has procedures to help ensure the confidentiality of client records and information. Data security is a sophisticated process, from access controls and encryption to monitoring systems and defined governance.

Controls to Protect Client Information

Pershing's data protection controls include:

- › Encryption for the transmission of information
- › Secure development life cycle designed to ensure that client information system modifications are consistent with our information security program
- › Monitoring systems and procedures to detect actual and attempted intrusions into systems containing client information
- › Response programs that specify actions to be taken for any identified instance of actual or potential unauthorized access to client information systems
- › Access controls on systems that contain client information to authenticate and permit access only to authorized individuals
- › Access restrictions at physical locations containing client information, such as buildings, computing facilities and records storage facilities
- › Segregation of duties and employee background checks
- › Periodic reviews conducted to evaluate all entitlements for application system access

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Information Security Components

Pershing's information security program supports the protection of client information in a variety of ways, including:

- › Information Security Management
- › Security Architecture
- › Security Administration
- › Data Protection
- › Data/Media Erasure, Destruction and Disposal
- › Encryption
- › Security Awareness and Training
- › Network, Operating System, and Database Security
- › Data Backup and Retention

- › Secure Remote Access
- › Email Encryption
- › Intrusion Detection
- › Incident Response
- › Data Loss Detection and Prevention

Our People Make the Difference

Our information risk management group includes people with backgrounds in law enforcement. They are certified in information protection areas such as Certified Ethical Hackers and Certified Information Security Professionals. Every employee has ongoing training in risk awareness. Pershing employees hold leadership positions and participate on hundreds of industry committees, boards and task forces, including leading data security forums to help ensure that protective knowledge and identified threats are shared.

Pershing understands the importance of protecting client information and we have the people, systems and processes in place to help ensure the security and confidentiality of client records and information. Your assets and data deserve nothing less.

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