

Independent Service Auditors' Report



DriveSavers Data Recovery, Inc.

Independent Service Auditors' Report On DriveSavers Data Recovery, Inc.'s Description Of Its Data Recovery System, and on the Suitability of the Design and Operating Effectiveness of Controls for the Security Trust Principle Criteria

For Period:

May 1, 2017 through April 30, 2018



CliftonLarsonAllen LLP
Minneapolis, MN



WEALTH ADVISORY | OUTSOURCING | AUDIT, TAX, AND CONSULTING



Section I. Independent Service Auditors' Report

We have examined the description in Section III titled "System Description of Its Data Recovery System" throughout the period May 1, 2017, to April 30, 2018, (description) based on the criteria set forth in paragraph 1.26 of the AICPA Guide *Reporting on Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy (SOC 2®)* (description criteria) and the suitability of the design and operating effectiveness of the controls described therein to meet the criteria for the security principle set forth in *TSP Section 100A, Trust Services Principles and Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (2016)* (AICPA, *Trust Services Principles and Criteria*) (applicable trust services criteria), throughout the period May 1, 2017, to April 30, 2018.

As indicated in the description, DriveSavers uses a subservice organization for managed IT services. The description includes only the applicable trust services criteria and related controls of DriveSavers and excludes the related controls of the subservice organization. The description also indicates that certain applicable trust services criteria can be met only if complementary subservice organization controls assumed in the design of DriveSavers' controls are suitably designed and operating effectively, along with the related controls at DriveSavers. Our examination did not extend to controls of 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 certain applicable trust services criteria specified in the description can be met only if complementary user entity controls assumed in the design of DriveSavers' controls are suitably designed and operating effectively, along with related controls at the service organization. Our examination did not extend to such complementary user entity controls, and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

Service Organization's Responsibilities

In Section II, DriveSavers has provided its assertion titled "DriveSavers Management Assertion" (assertion) about the fairness of the presentation of the description based on the description criteria and suitability of the design and operating effectiveness of the controls described therein to meet the applicable trust services criteria. DriveSavers is 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; identifying the risks that would prevent the applicable trust services criteria from being met; designing, implementing, and documenting the controls to meet the applicable trust services criteria; and specifying the controls that meet the applicable trust services criteria and stating them in the description.

Service Auditors' Responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the description based on the description criteria and on the suitability of the design and operating effectiveness of the controls described therein to meet the applicable trust services criteria, based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included procedures that we considered necessary in the circumstances. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether, in all material respects, the description is fairly presented based on the description criteria, and the controls were suitably designed and operating effectively to meet the applicable trust services criteria throughout the period May 1, 2017, to April 30, 2018. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

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

- evaluating and performing procedures to obtain evidence about whether the description is fairly presented based on the description criteria, and the controls were suitably designed and operating effectively to meet the applicable trust services criteria throughout the period May 1, 2017, to April 30, 2018.
- assessing the risks that the description is not fairly presented based on the description criteria and that the controls were not suitably designed or operating effectively to meet the applicable trust services criteria.
- testing the operating effectiveness of those controls that management considers necessary to provide reasonable assurance that the applicable trust services criteria were met.
- evaluating the overall presentation of the description, the suitability of the applicable trust services criteria stated therein, and the suitability of the criteria specified by the service organization in its assertion.

Inherent Limitations

The description is prepared to meet the common needs of a broad range of users and may not, therefore, include every aspect of the system that each individual user may consider important in its own particular environment. Because of their nature and inherent limitations, controls at a service organization may not always be suitably designed and operate effectively to meet the applicable trust services criteria. Also, the projection to the future of any evaluation of the fairness of the presentation of the description or conclusions about the suitability of the design or operating effectiveness of the controls to meet the applicable trust services criteria is subject to the risks that the system may change or that controls at a service organization may become ineffective.

Opinion

In our opinion, in all material respects, based on the description criteria identified in DriveSavers' assertion and the applicable trust services criteria—

- a. the description fairly presents the system that was designed and implemented throughout the period May 1, 2017, to April 30, 2018,
- b. the controls stated in the description were suitably designed to provide reasonable assurance that the applicable trust services criteria would be met if the controls operated effectively throughout the period May 1, 2017, to April 30, 2018,, and subservice organizations and user entities applied the complementary controls assumed in the design of DriveSavers' controls throughout the period May 1, 2017, to April 30, 2018,.
- c. the controls operated effectively to provide reasonable assurance that the applicable trust services criteria were met throughout the period May 1, 2017, to April 30, 2018, if the subservice

organizations and user entities applied the complementary controls assumed in the design of DriveSavers' controls, and those controls operated effectively throughout the period May 1, 2017, to April 30, 2018.

Description of Tests of Controls

The specific controls we tested and the nature, timing, and results of those tests are listed in Section IV, "DriveSavers' Controls; and CliftonLarsonAllen LLC's Test(s) of Controls and Test(s) Results" of this report.

Restricted Use

This report, including the description of tests of controls and results thereof in Section IV, is intended solely for the information and use of DriveSavers; user entities of DriveSavers' data recovery system during some or all of the period May 1, 2017, to April 30, 2018; and prospective user entities, independent auditors, and practitioners providing services to such user entities, and regulators who have sufficient knowledge and understanding of the following:

- The nature of the service provided by the service organization.
- How the service organization's system interacts with user entities, subservice organizations, or other parties.
- Internal control and its limitations.
- Complementary user entity controls and how they interact with related controls at the service organization to meet the applicable trust services criteria.
- The nature of subservice organizations and how their services to a service organization may affect user entities.
- The applicable trust services criteria.
- The risks that may prevent meeting the applicable trust services criteria and how controls address those risks.

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

CliftonLarsonAllen LLP

CliftonLarsonAllen LLP

Minneapolis, Minnesota

JUNE 22, 2018

Section II. DriveSavers Management Assertion



DriveSavers Data Recovery

DriveSavers Data Recovery, Inc.'s (DriveSavers) Management Assertion

We have prepared the description of DriveSavers' data recovery system entitled, "System Description of Its Data Recovery System," throughout the period May 1, 2017, to April 30, 2018, (description) based on the criteria for a description of a service organization's system identified in paragraphs 1.26 of AICPA Guide *Reporting on Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy* (SOC 2®) (description criteria). The description is intended to provide users with information about the [type or name of] system, particularly system controls intended to meet the criteria for the security principle set forth in TSP section 100A, *Trust Services Principles and Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* (2016) (AICPA, *Trust Services Principles and Criteria*).

DriveSavers uses a service organization (subservice organization) to perform managed IT services. The description includes only the control of DriveSavers and excludes controls of the subservice organization. The descriptions also indicates that certain applicable trust services criteria can only be met if controls at the subservice organization contemplated in the design of DriveSavers' controls are suitably designed and operating effectively, along with the related controls at the service organization. The description does not include any of the controls implemented at the subservice organization.

The description also indicates that certain trust service criteria specified in the description can only be met if complementary user entity controls contemplated in the design of DriveSavers' controls are suitably designed and operating effectively, along with the related controls at the service organization. The description does not include any of the controls implemented at the user entities.

We confirm, to the best of our knowledge and belief, that

- a) the description fairly presents the data recovery system throughout the period May 1, 2017, to April 30, 2018, based on the following description criteria:
 - i. The description contains the following information:
 - (1) The types of services provided.
 - (2) The components of the system used to provide the services, which are as follows:
 - *Infrastructure*. The physical structures, IT, and other hardware (for example, facilities, computers, equipment, mobile devices, and telecommunications networks).
 - *Software*. The application programs and IT system software that supports application programs (operating systems, middleware, and utilities).

- *People*. The personnel involved in the governance, operation, and use of a system (developers, operators, entity users, vendor personnel, and managers).
 - *Procedures*. The automated and manual procedures.
 - *Data*. Transaction streams, files, databases, tables, and output used or processed by the system.
- (3) The boundaries or aspects of the system covered by the description.
 - (4) How the system captures and addresses significant events and conditions.
 - (5) The process used to prepare and deliver reports and other information to user entities or other parties.
 - (6) For information provided to, or received from, subservice organizations and other parties, (a) how the information is provided or received and the role of the subservice organizations and other parties and (b) the procedures the service organization performs to determine that such information and its processing, maintenance, and storage are subject to appropriate controls.
 - (7) For each principle being reported on, the applicable trust services criteria and the related controls designed to meet those criteria, including, as applicable, (a) complementary user entity controls contemplated in the design of the service organization's system.
 - (8) For subservice organizations presented using the carve-out method, the nature of the services provided by the subservice organization; each of the applicable trust services criteria that are intended to be met by controls at the subservice organization, alone or in combination with controls at the service organization, and the types of controls expected to be implemented at carved-out subservice organizations to meet those criteria.
 - (9) Any applicable trust services criteria that are not addressed by a control at the service organization and the reasons therefore.
 - (10) Other aspects of the service organization's control environment, risk assessment process, information and communication systems, and monitoring of controls that are relevant to the services provided and the applicable trust services criteria.
 - (11) Relevant details of changes to the service organization's system during the period covered by the description.
- ii. The description does not omit or distort information relevant to the service organization's system while acknowledging that the description is prepared to meet the common needs of a broad range of users and may not, therefore, include every aspect of the system that each individual user may consider important to his or her own particular needs.
- b) the controls stated in the description were suitably designed throughout the period May 1, 2017, to April 30, 2018, to meet the applicable trust services criteria.
 - c) the controls stated in the description operated effectively throughout the period May 1, 2017, to April 30, 2018, to meet the applicable trust services criteria.

By:

Michael Hall

Michael Hall
Chief Information Security Officer

DriveSavers Data Recovery Inc.