

ROYAL FLUSH FINANCIAL HOLDINGS, INC. DATA SECURITY POLICY

*/** Instructions For Data Security Policy: For established businesses with management team and employees. This document is filed with your company records. The custodian (the person who is responsible for implementing and managing the security policy) is your Security Officer. Generate the policy and then modify according to your specific requirements. ***/*

Royal Flush Financial Holdings, Inc.
Data Security Policy
Effective Date: **October, 2018**

INTRODUCTION

The purpose of this Policy is to describe Royal Flush Financial Holdings, Inc.'s security policy regarding personal information collected and processed by Royal Flush Financial Holdings, Inc.'s online services ("Policy").

Specifically, this Policy is intended to identify Royal Flush Financial Holdings, Inc.'s policies, procedures, and auditing and training practices utilized for data security, and our resulting responsibilities to protect personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction.

PERSONAL INFORMATION

Royal Flush Financial Holdings, Inc. collects personal information in accordance with our Privacy Policy. This information is stored in a secure facility on hardened systems using reasonable and adequate security protocols. Access to this information is restricted to authorized personnel only.

APPROACH TO SECURITY

The following sections describe Royal Flush Financial Holdings, Inc.'s comprehensive approach to ensuring enterprise-wide compliance with its Policy. This consists of four (4) major areas: Security, Personnel, Education, Verification and Contracts.

SECURITY

Security of data is the cornerstone of verifying privacy of data. Royal Flush Financial Holdings, Inc. maintains a rigorous security posture through focused methodology. It is founded on the implementation of best practices and security policies in five (5) major areas providing enterprise wide coverage including:

- Regulatory Controls
- Organizational Controls

Service Provider Controls
Standardized Process and Practices
Business Partner Control.

Key policies in place that contribute to the verification and compliance with the Policy are:

Awareness and Training
Personnel Practices
Administrative Roles and Responsibilities
Network and Telecommunications Security
Incident Detection and Reporting
Malicious Code Control (Antivirus)
Portable Computers
Logical and System Access
Physical Access
Remote Access
Firewall Management
Third Party Services
Software Licensing and Appropriate usage
Auditing and Monitoring
Data Classification, Confidentiality, Integrity and Availability
Policy Compliance

Operational procedures demonstrating compliance with the Policy are:

Change Control
Event monitoring
Data backup
System hardening

The above referenced policies and procedures are documented and available for review.

PERSONNEL

Our personnel consist of employees and contractors.

EDUCATION

Royal Flush Financial Holdings, Inc. regularly notifies and reinforces its Privacy Policy with its personnel. This is done using the following process:

The Privacy Policy is distributed company-wide via email upon employment and when updated.

The Policy is displayed on Royal Flush Financial Holdings, Inc.'s website.

At least once per year, the Policy is presented and discussed at a company-wide meeting.

VERIFICATION

The Policy is self-verified periodically by Royal Flush Financial Holdings, Inc.'s Security Officer. The Security Officer is responsible for:

Ensuring that the policies, guidelines, internal procedures, personnel training, and other measures necessary to implement the Policy are developed and put into practice,

Working with Royal Flush Financial Holdings, Inc.'s legal counsel to ensure Royal Flush Financial Holdings, Inc.'s ongoing compliance with applicable privacy laws and agreements, as well as any of Royal Flush Financial Holdings, Inc.'s other related legal obligations, and

Overseeing annual assessments of Royal Flush Financial Holdings, Inc.'s internal and external practices to ensure that they conform to the Policy and related company obligations.

In addition, Royal Flush Financial Holdings, Inc., through its internal audit processes, conducts an audit of its security controls a minimum of once per year. This independent review assesses the physical security, network security and operational policies and controls in place to protect customer data.

CONTRACTS

As a condition of employment, all Royal Flush Financial Holdings, Inc. personnel must sign an IP Confidentiality Agreement. This agreement includes a provision that addresses personnel responsibility regarding compliance with privacy-related matters.

IN WITNESS WHEREOF, the undersigned Security Officer hereby accepts this Data Security Policy and agrees to implement all terms and conditions thereof.

Kevin M. Edwards, Security Officer