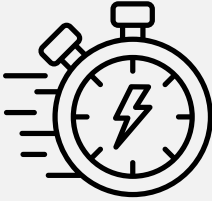
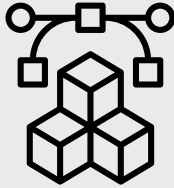
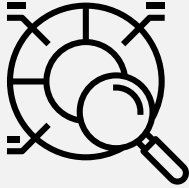

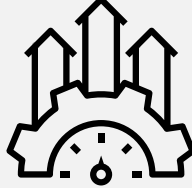



REGULATION S-P ROADMAP

Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
 Incident Response Program Create or update Information Security Policy, Incident Response Program, and Data Breach Notification Process.	 Policy & Notice Updates Review & update Privacy Policy & Notice, Books & Records Policy, Business Continuity Plan as needed.	 Customer Information Inventory Identify all systems, processes, and activities where customer information is stored, received, or transmitted.	 Risk Management Alignment Implement or enhance internal privacy and cybersecurity controls as needed.	 Service Provider Oversight Identify & assess service providers, negotiate updated agreements, implement ongoing vendor due diligence & oversight process.	 Training & Awareness Deliver Reg S-P training to relevant staff covering amendments and obligations.