

SmartSimple Software Exit Plan

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Document Objective:

Purpose: This document outlines the exit plan for the client's transition out of SmartSimple Cloud services to ensure a smooth transition, data export and a successful disengagement from SmartSimple Cloud.

Scope: This plan applies to all clients' instances and underlying AWS storage.

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Contractual Obligations and Termination:

Our Governance, Risk and Compliance (GRC) Team will be notified of a client's termination through the following channels;

- Directly by the Client
- Account Management
- Account Receivables
- Support Team

The notice of termination is considered the date upon which client communication is received by one a team member of the aforementioned teams of the intent to terminate the contract.

Upon notice of termination, the GRC Team will confirm the effective date of termination which is the date where both parties officially exit the contract and both parties have fulfilled all obligations as stipulated in the agreements. At this time, the client will also designate a point of contact for SmartSimple to communicate notices of data export and data purge.

Once the effective date of termination is confirmed, the GRC team will initiate the following steps with our procurement and finance team to ensure that all financial aspects of the contract termination are handled accurately and in accordance with the contractual agreements.

1. Review Contractual Obligations:

- The procurement team will review the contract terms and conditions related to termination, including any financial implications or obligations.

2. Financial Settlement Calculation:

- Based on the contract terms, the finance team will calculate any outstanding amounts owed by either party, accounting for services rendered, outstanding invoices, prepaid fees, or any other financial elements related to the contract.

3. Invoice and Payment Handling:

- The finance team will generate and send final invoices to the client depending on the payment terms specified in the contract.
- Outstanding invoices are paid before data extract and system commissioning is initiated

4. Contract Closure and Documentation:

- The finance team will update the client record and mark it as terminated in the system.
- They should ensure that all financial documentation, including invoices, receipts, and settlement agreements, are appropriately filed and maintained for record-keeping and audit purposes.

Data Export Timeline and Milestones:

The GRC team will schedule export of client data within 30 days after the effective date of termination. Upon the effective date of termination, the following actions will also commence:

- Client access to the system is disabled
- All pending workflows, SMTP and any active integrations are disabled
- All client contacts are removed from SmartSimple's distribution lists

SmartSimple uses Secure File Transfer Protocol (SFTP) for transfer of data files to ensure confidentiality and integrity of data during transit. Within that time period, the client's primary contact will receive an email with the necessary credentials to access the final CSV data export from SmartSimple's SFTP server.

Within the email, the client will have 90 days from provisioning date to retrieve the final data export in the SFTP repository before the data is purged. The client is responsible for communicating any extensions greater than the 90 days in a timely manner back to the GRC team if data purge is to be delayed.

System Decommissioning:

SmartSimple adheres to ISO27001 and SOC 2 Type II compliance for a system's lifecycle management. As documented in our Information Security Management System (ISMS) 20, our Development Operations team follows documented policies and procedures for system decommissioning. The purging of data is initiated after a period of 90 days of the provisioning date.

Deletion of underlying AWS storage volume and data is carried out via hypervisor processes and follows the techniques detailed in Department of Defense (DoD) 5220.22-M ("National Industrial Security Program Operating Manual") or NIST SP 800-88 ("Guidelines for Media Sanitization") to destroy data as part of the decommissioning process.

Once the decommissioning process is completed, the client receives a Certificate of Destruction to demonstrate SmartSimple's commitment to compliance with data protection and accountability of our data disposal process.