



Edward P. Jones
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Reference: Letter of Attestation for Panzura Corporation

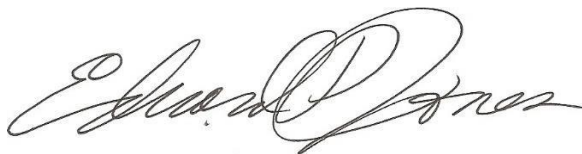
To Whom It May Concern,

This document serves as a formal letter of attestation that Panzura Corporation, has satisfactorily passed the HIPAA Security Risk Assessment and Risk Analysis performed by Third Rock, Incorporated, attaining a “highly compliant” review. The remote assessment was performed between May 1, 2017 and May 10, 2017 reviewing Panzura administration, IT systems and Customer Support organization. Panzura does not receive, create, store or transmit electronic Protected Health Information (ePHI), but could access ePHI during the customer support process of their cloud data storage filers utilized by healthcare Covered Entities and Business Associates.

The HIPAA Security Risk Assessment focused on the customer support process and organization. The Customer Support organization provides continuous coverage, with the main support group at its Campbell, California headquarters, and does employ subcontractors to augment the 24-hour support provided. Appropriate Business Associate Agreements are in place with subcontractors. In addition, a risk management process has been adopted, supported by HIPAA policies and procedures, and all technical support staff members have completed HIPAA Security and Privacy training. Panzura successfully remediated deficiencies identified during the HIPAA Security Risk Assessment to be recognized as “highly compliant”.

Panzura was found to meet applicable HIPAA compliance requirements as specified below in Table 1.

Sincerely,

A handwritten signature in black ink that reads "Edward P. Jones".

Edward P. Jones, PMP, CHSP
Chief Compliance Officer

Table 1: Risk Assessment and Risk Analysis – Primary HIPAA Technical Safeguards

CFR Sections	Requirement	Explanation
164.308(a)(1)	Security Management Process	PANZURA has performed a Risk Assessment and Risk Analysis, implemented policies and procedures including Sanctions and Risk Management, and review of IT systems activity reports.
164.308(a)(2)	Assigned Security Responsibility	PANZURA has a designated Privacy/Security Officer with additional assigned security responsibilities and procedures.
164.308(a)(5)	Security Awareness and Training	Security training has been taken by the PANZURA team that included malicious software protection and password management.
164.308(b)(1)	Business Associate Contracts and Other Arrangements	PANZURA has implemented Business Associate Agreements with its subcontractors who are engaged with the Customer Support Organization.
164.310(c)	Workstation Security	PANZURA has adopted policies and procedures that address this requirement.
164.310(d)(1)	Device and Media Controls	PANZURA has adopted policies and procedures that address these requirements.
164.312(a)(1)	Access Control	PANZURA has technical capabilities in place and adopted policies and procedures to enforce unique user identification, automatic logoff.
164.312(d)	Person or Entity Authentication	PANZURA has technical capabilities in place and adopted policies and procedures to verify unique user access request to systems and applications.
164.316(a)	Policies and Procedures	Panzura has implemented reasonable and appropriate policies and procedures to comply with the standards, implementation specifications, or other requirements.