

# Our Commitment to CyberSecurity and Data Integrity

Ingham Retirement Group takes safeguarding your plans seriously.

We believe through diligence, collaboration, and education we can secure your information. We are committed to both integrity and innovation, Ingham Retirement Group has an ethical, legal, and professional obligation to ensure the information we hold follows the principles of confidentiality and accessibility.

We take a two-pronged approach to security — education and investment.

- ◆ We believe effective data security starts with employee awareness, training and risk assessment.
- ◆ We invest in technologies that secure our environment.

## Cybersecurity at Ingham

### Ensuring data protection for our clients.

*Today's world—often referred to as the “information age”—has seen people generate, store and exchange information at an unparalleled rate of frequency and volume. This has greatly changed the ways in which we interact with one another, not just as individuals, but also within and between organizations. Countless benefits have emerged, but these have arrived with serious challenges in the areas of security and privacy, manifested by the growing amount of new regulations concerning the storage of data.*

### EDUCATION—PRONG ONE

- ◆ We believe effective data security starts with employee awareness, training and risk assessment.
  - ◇ Information security constitutes a significant investment—from training our people to ensuring the right mix of systems and operational controls are in place to ensure protection.
  - ◇ Our associates are regularly trained, made aware of security practices and privacy-related regulations, and are required to take a monthly security awareness training course. Our software developers are also required to take additional courses related to creating secure application programs.
  - ◇ KnowBe4 is a grouping of 10 online 5-7 minute tutorials that will evaluate and train employees on good security practices around the office. We have made these available to our clients after logging into their retirement account to help make them aware of how to stay ahead of a cyber threat.



*In the wake of recent Cyber Security breaches in the media, we want to ask clients of Ingham Retirement Group to please partner with us to make sure your and your participants' data is secure.*

*—Ken Ingham  
President & CEO*

- ◇ Our technology team has implemented its own internal phishing testing and awareness campaign to measure and benchmark employee awareness to suspicious emails. The team also initiates an annual penetration test done by an independent third party.
- ◇ Cyber security incident response is one part of our disaster recovery testing in which our associates participate.
- ◇ Analyzing risk is a critical first step—from rating and performing due diligence on third party vendors to reviewing safety, privacy and general compliance issues through our Risk Committee, we make risk assessment and mitigation a priority.
- ◇ We maintain a number of security-related policies and procedures including a Cyber Security and Incident Response policy.

### CUTTING EDGE TECHNOLOGY - PRONG TWO

- ◆ [We invest in technologies that secure our environment.](#)
  - ◇ We utilize commercial network perimeter security devices to secure our network.
  - ◇ We continuously deploy software programs that detect attack patterns, respond immediately, and alert IT personnel. These intrusion-detection and prevention solutions are in addition to anti-spam, anti-advertisement and anti-virus solutions.
  - ◇ We prescribe to alert services such as USCERT the U.S. Homeland security email alerts, as well as other sources to monitor developing security threats, trends, and known new weaknesses.
  - ◇ We require annual audits and attestations like the SSAE 16 audit that review the accuracy and completeness of our data center operations.
  - ◇ We utilize secure email and offer several other secure means for our clients to transmit data and Personally Identifiable Information to us.
  - ◇ We have deployed Multi-Factor Authentication for our recordkeeping system.
  - ◇ We contract with cyber security experts to conduct annual penetration testing of our network.

### *In Summary*

*Ingham Retirement Group places utmost importance on Cyber Security to protect the private/confidential information of our clients and has deployed various software to ensure data integrity for all of them and their participants. We have implemented strict Information Security and Incident Response Policies and hold mandatory employee training regularly to reinforce these policies. We are committed to provide the optimal framework and technology for our business strategy. We are focusing on client's data by developing, implementing and maintaining the latest security technological strategies by providing a secured business environment for your retirement plans.*

## Focusing exclusively on retirement.

We are a national, independent, full service retirement plan consulting, investment advisory, record keeping and actuarial firm with more than \$2.3 billion under administration.

**We are INGHAM.**

## Our New Technology

- ◆ 2016 - Implemented Trend Micro User Protection, an XGen™ security solution.
- ◆ Varonis is deployed to monitor internal vulnerabilities and identify all (PII) data in order to apply additional restrictive access policies.
- ◆ Deployed a rigorous tape backup schedule for the firm's essential data, we have implemented real time data replication as part of our data security strategy.
- ◆ 2017 - We've upgraded our Business Continuation Plan and emergency recovery readiness by relocating our data center into a Hurricane Cat 5 proof facility, equipped with long term generator power, redundant communication facilities while being on the high priority grid of Florida Power and Light. The data center is also outside the FEMA 500 year flood zone (Flood Zone X).
- ◆ Our Disaster Recovery readiness is tested annually in July and documented in an extensive test result report delivered to the Executive Management of our firm.
- ◆ 2018 - Implemented "DMZ & Reverse Proxy Secured" to our network infrastructure to protect: network, server, computers, communications for internal and external users and clients.
- ◆ Implemented Mimecast Secure Email Gateway to keep sophisticated attackers out,. Deployed innovative applications and policies to keep sensitive information secure.
- ◆ Multi-layered detection engines and intelligence protect the company and employees from spear-phishing, malware, spam and zero-day attacks. Keep confidential data safe by blocking messages, encrypting mail and holding sensitive information in a protected cloud service.
- ◆ Implemented ACH verification software. Upgraded our Security questions online and implemented a more stringent identity validation process.
- ◆ 2019 - Deployed CloudJacket, a 24/7 monitoring system that manages, detects, and responds to ongoing cybersecurity threats by deploying advanced threat detection tools that protect against known, emerging, and advanced threats.
- ◆ Enhanced our system capabilities by installing a NAS storage unit and are using secure cloud technology to back up essential data as part of our enhanced business continuation plan.



For more information,  
please call us at  
**(888) 458-5557**



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