Summary

Complying with regulations, including HIPAA, CPNI, and PCI, often requires a combination of technology, company policy and company process. Northland can make statements related to technology we provide, but customers are responsible for aligning technology with policy and process in order to remain compliant.

This document provides:

1. A summary of the policies and standards that Northland complies with
2. Details of product capabilities that can assist a customer when determining if a Northland product complies with certification standards such as HIPAA, PCI or others

Northland Policies and Standards

1. Northland maintains PCI compliance through our financial partners regarding its own business operations when handing credit card information
2. Northland is an FCC regulated company and is required to adhere to CPNI (Customer Proprietary Network Information) standards. Northland provides training to employees on CPNI and has controls to limit access to customer information
3. Northland publishes a customer privacy policy, which strictly governs access by employees and others to customer communications and information
4. Northland publishes a security and reliability statement that outlines security controls in place which includes access control and security systems
5. Northland will comply with requests by customers for third party audits in situations where the customer needs to ensure compliance with any standard
6. Strict confirmation of authorized contacts. Northland takes measures to ensure that only authorized contacts can make changes to services
7. Northland employees also sign and comply with the Confidentiality Policy in Employee Handbook that highlights importance of protecting confidential information

Limitation of Liability

1. With exception to the specific claims made in this document, Northland assumes no responsibility for ensuring that a customer complies with any certification standard

2. Northland will have no liability of any nature in the absence of gross negligence or willful misconduct, and that, in any event, regardless of the form of the action, the Customer's exclusive remedy, and the total liability of Northland, arising out of or in any way connected directly or indirectly, with service provided by Northland, for any cause whatsoever, shall be limited to payment by carrier in any amount equivalent to the proportionate charge to the customer for the period of service for which issue occurs. In no event shall Northland be liable to customer for any special, consequential or incidental damages.

Product Specific Capabilities and Limitations

1. **Cloud Fax**

   a. Product Description – Provides a hosted faxing service where customers can send and receive faxes via Email
   b. Security Features
      i. Can be configured for zero retention as prescribed by HIPAA regulations
      ii. Access to system management is limited to core staff of network engineers

2. **Business Unlimited**

   a. Product Description – A hosted telephone system that works over the internet. Includes the following components:

      i. **BU Commportal** – Customer web interface for managing telephone system features
         1. Secured with SSL and strict password requirements
         2. Customer can choose which accounts have administrative access

      ii. **Accession Communicator** - A desktop and mobile softphone application that can send and receive calls and provide private instant messaging as part of a telephone system.
         1. _Voice Encryption (TLS/SRTP)_ – Currently not enabled. _Northland is working to enable this for all customers with expected release before end of May 2020._

      iii. **Accession Meeting** - A video conferencing platform that is integrated with a telephone system
         1. Video and Audio Encryption enabled for all customers
         2. Ability to protect conference rooms with passwords

    iv. Desktop Phone Options

        1. **Mitel 6867i** – Currently does not provide TLS/SRTP encryption. *Northland is working to enable this for all customers with expected release before end of May 2020*

        2. **Mitel 6863** – Not capable of TLS/SRTP encryption

        3. **Yealink Conference Phones** - Currently does not provide TLS/SRTP encryption. *Northland is working to enable this for all customers with expected release before end of May 2020*

3. **Private MPLS Data**

   a. Product Description – Securely extends a customer wide area network from multiple locations through Northland's network. Able to be combined with internet and voice services.

   b. Security Features

       i. All data is contained within Northland's secured network or through third party connections that are not on the internet.

       ii. Customer data is isolated in a private VLAN using MPLS VRF standards.

       iii. Network connections are continuously monitored

4. **Internet Bandwidth**

   a. Product Description - Internet access over a variety of connection options to a customer location from Northland.

   b. Security Features

       i. Northland can optionally provide a NAT firewall that protects a customer's network from the internet

       ii. Internet access is fully open with no firewall limitations. The customer is responsible to ensure that they have a firewall at their location

5. **Physical Colocation**

   a. Product Description – Datacenter space provided to customers to place network and computing equipment

   b. Security Features

       i. Escorted Access only

       ii. Third Party monitored security system

       iii. Video Camera recording systems

       iv. FOB access control and logging

6. Virtual Servers

   a. Product Description – Virtual server space provided to customers to run Windows and Linux based operating systems for applications and backup purposes.
   b. Security Features
      i. Physical Security as described in datacenter sections
      ii. Strict network and computing isolation based on VMWare ESXi standards
      iii. Limited access to network engineering staff only

7. Domain Name Service (DNS)

   a. Product Description – A complimentary service that resolves hostnames into IP address for customers with registered domain names.
   b. Security Features
      i. DNS servers running latest version of standard BIND
      ii. DNSSEC
      iii. Strict access control to DNS records by authorized staff only
      iv. No external access to customers to permit management of DNS.