

WKFS Gramm-Leach-Bliley Compliance Statement & Information Security Plan

WKFS complies with its obligations of the Financial Services Modernization Act of 1999, also known as the Gramm-Leach-Bliley Act, 15 U.S.C. §6801 (the “GLB Act”).

As a third party service provider that provides services to financial organizations, WKFS is subject to applicable requirements of the GLB Act. In this role, WKFS may receive nonpublic personal information of customers of financial organizations. WKFS may use or disclose such nonpublic personal information in the ordinary course of business solely to maintain or service the customer’s account or as necessary to effect, administer or enforce a transaction that the customer requests or authorizes. WKFS may not use or disclose such nonpublic personal information for any other purpose.

WKFS operates under an Information Security Plan of its parent company, Wolters Kluwer N.V. established for all Wolters Kluwer companies. The Information Security Plan describes the safeguards to protect information and data in compliance with the GLB Act (the “Protected Information”) in order to:

- Protect the security and confidentiality of Protected Information;
- Protect against anticipated threats and hazards to the security or integrity of such Protected Information; and
- Protect against unauthorized access to or use of Protected Information that could result in substantial harm to financial organizations and customers.

The WK Information Security Plan also provides mechanisms to:

- Identify and assess the risks that may threaten Protected Information maintained by WKFS;
- Designate employees responsible for coordinating the Information Security Plan;
- Design and implement a safeguards program;
- Manage the selection of appropriate subcontractors;
- Adjust the plan to reflect changes in technology, the sensitivity of Protected Information, and internal or external threats to information security; and
- Reference related policies, standards, and guidelines.

A copy of the Wolters Kluwer Information Security Plan (Aug. 2011 version) is available separately upon request.