

## SNL PRIVACY, INFRASTRUCTURE, AND SECURITY STATEMENT

September 1, 2008

### Purpose

This is the current **SNL Financial LC Privacy and Security Statement**. It supercedes any prior Privacy and Security Statements issued by SNL Financial LC. As SNL's product offerings and technology platform evolve, SNL will always seek to provide our clients with the high availability, accurate data products.

This statement is provided for informational purposes only and is not a performance guarantee for SNL products. It is intended to educate our clients and potential clients about the robust technology platform that SNL manages for our products. Specific client contracts that include privacy, security and performance statements supercede this document. SNL reserves the right to change this Privacy and Security Statement from time to time.

### Availability and Disaster Recovery

#### ***Continuous Availability***

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The SNL Network Operations Center (NOC) and information systems architecture is designed such that all critical components have redundant systems. The SNL Interactive (SNLi) products available over the Internet are all made available to clients and the public via a fault-tolerant platform of redundant database and web servers monitored by SNL's Network Services staff 24 hours a day. All hardware and software involved in the delivery of SNL's Internet products are directly managed by SNL personnel (excluding Internet Service Provider equipment and circuits).

SNL works with multiple national Internet Service Providers (ISP) for Internet connectivity. In case of an outage with one provider, SNL's traffic is automatically routed via the secondary provider. All web ([www.snl.com](http://www.snl.com)), DataSource update, FTP and mail servers are maintained in the secured SNL NOC and in a separate co-location facility. SNL has multiple Internet circuits, provisioned over fiber optic SONET rings in Charlottesville, VA. These self-healing fiber connections are diversely routed (i.e. the cabling enters from one side of the SNL headquarters and exits on the other) which provides even greater fault tolerance. SNL's critical telecommunication circuits are also provisioned via SONET fiber.

SNL's critical third-party data feeds take advantage of our access to redundant Internet connections and in some cases to backup satellite feeds.

#### ***Data backup procedures***

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The data backup schedule includes full backups of all systems once a week, with incremental backups conducted nightly. Tape sets are rotated weekly and stored in locked vaults both on-site and off-site. Tapes are archived the beginning of each month and stored for twelve months.

***Is there a Disaster Recover Plan that prepares SNL for the loss of the building, the NOC, telecommunications services, etc.?***

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Yes, SNL maintains a Disaster Recovery Plan.

## **Physical Security**

### ***Building Security***

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**Are the entrances to the SNL Financial facilities secured?**

Yes. All entrances to the Charlottesville, Virginia buildings are secured by a key card security system 24x7. All employees are assigned a unique key card.

**How are the key cards/PINs distributed, monitored, maintained?**

Key cards are distributed to SNL employees who are permitted access to the SNL facility in Charlottesville. Use of key cards is constantly monitored and recorded in a database. The SNL Human Resources Department controls and manages all key card assignments. Employee key cards are deactivated as part of the employee termination procedures.

**Is entrance alarmed?**

Yes. Alarms are monitored by an off-site agency which notifies SNL personnel and law enforcement agencies when alarms are activated. The facility has motion sensors, door/glass sensors, and smoke sensors in a centralized system.

### ***Network Operations Center (NOC) Security***

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**Are the entrances to the SNL Financial NOC secured?**

Yes, only authorized personnel have access to the locked server room, telecommunications room, UPS room, generator room, and cabling closets. The NOC and telecommunications rooms are secured by a key card security system 24x7. The NOC has an independent security alarm system. Non SNL personnel (e.g. consultants, telecommunications providers visiting the telco demarc, etc.) must be escorted in secured areas.

**Are SNL's computer servers in the NOC protected from direct access?**

Yes. Unless in use by a member of the SNL Systems Department, all servers remain locked and require an authenticated login to gain access.

**Does the NOC have fire/smoke alarms and fire extinguishers?**

Yes. The SNL NOC has an HFC-227ea fire suppression system that protects the server room and telecommunications demarc. The HFC-227ea system is tested and checked annually. The system includes smoke and fire sensors and it is connected to SNL's alarm monitoring agency.

**Is there an uninterruptible power system (UPS) supporting the NOC?**

Yes. Both the primary NOC and the co-location facility have battery backup and diesel generator systems that comprise the UPS. SNL's current headquarters is a former government military facility known for its stable power source.

## Information Systems Security

### ***Security Plans & Procedures***

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SNL has a designated, senior level network engineer who maintains the corporate security plans and procedures. SNL network engineers maintain SNL's hardware-based firewalls and other security monitoring tools. While threats always exist for any connection to the Internet, SNL's network is secured by enforcing security procedures and by limiting outside access to SNL's systems. The SNLi product platform is 100% managed by SNL staff within a protected SNL facility and the secured co-location facility.

### ***Hardware & software security/monitoring***

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#### **Firewall and Router Security**

SNL's security tools and procedures are considered proprietary and confidential information. Access Control is a part of the SNL's total network infrastructure. High priority is placed on controlling access from the Internet to public accessible devices on SNL's network. All permitted traffic is noted and allowed. Traffic that is denied by rule or fails to meet allowed criteria is logged. Border routers are the first line of defense. Access Control is enhanced by the additional security of firewall technology that is configured to deny all traffic except traffic that is specifically allowed.

#### **Is logging active on firewalls and web servers?**

Yes. Logging is active on firewalls and web servers and these logs may only be accessed by authorized SNL employees.

#### **How are server, router and switching hardware monitored?**

SNL's servers are monitored by Compaq Insight Manager, and other software applications. SNL systems employees are on call 24x7 via PCS telephones that receive voice, numeric and data pages. These employees have a variety of responsibilities for SNL's information systems and each is alerted for any issues in their area.

#### **How are server connections secured?**

Connections are secured via username and password authentication.

### ***System changes and software deployment***

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#### **How are system and application changes controlled and logged?**

Systems changes are preceded and followed by established testing procedures. A log of all system changes is updated after changes have been completed. All proprietary SNL source code is maintained in version control systems. The servers housing this data are backed up to tape and these tapes are regularly rotated off-site. Change control procedures require signoffs by SNL staff, and sometimes by clients, from development to QA to Production environments.

## ***SNL Product Security***

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### **SNL IRWebLink**

#### **Where is an IRWebLink site stored?**

SNL's IRWebLink is a database-driven web application that benefits from SNL's data warehouse containing information on company financials, documents, news, corporate information, pricing, etc.). An IRWebLink site displays this information directly from SNL's database servers. A "framed" site utilizes existing pages on a client's web site and Internet domain that provide a framed view and navigation links around data dynamically generated and presented from SNL's systems. A "skinned" site is maintained entirely at SNL, although it requires a general link from a client's existing and separate web site and Internet domain to the investor relations content at SNL.

A client's graphics and stylesheets are prepared and created by SNL web designers and then secured in SNL's software version control systems which provides complete code source control and file-locking features. All proprietary SNL source code that runs the site is also maintained in version control systems. The servers housing this data are backed up to tape and these tapes are regularly rotated off-site. Change control procedures require signoffs by SNL staff and the client from development to QA to Production environments. SNL staff will not make any content changes to live sites without the prior knowledge and consent of the client.

Client-specific content (officer bios, company FAQ, company events, peer indexes, etc) are maintained by clients using SNL's proprietary Client Console. This easy to use application enables clients to customize the pages residing on SNL's servers. Any data submitted by the client is also then stored in SNL's database servers.

An IRWebLink site represents the combination of these elements, all of which are stored and protected on servers in the SNL NOC.

#### **Is access to the IRWebLink Client Console secure?**

The IRWebLink site is secured by a password and username which authorized SNL staff will provide only to people authorized at a client company to receive this information. A secure login option is available for access to the IRWebLink Client Console utilizing SSL (Secure Socket Layer).

#### **What SNL employees have access to IRWebLink client data?**

Access to modify a client's site is limited to staff authorized access for the purposes of client set-up, data testing, client support and product development. These permissions are stored in a secure database.

#### **SNL Interactive (SNLi)**

The modification of news content on the SNLi products is restricted to SNL News Department personnel only. Two separate entry systems, both requiring the use of individual network usernames and passwords, are used to enter "Summary" content news stories and "Feature" content news stories.

SNL procedures require that a story entered via either system be edited and approved by a staff Editor prior to being posted to a live site. Both news entry systems log all changes made to stories including: textual changes, coding changes, and approval changes.

The ability to assign the placement of stories on the Investor product home pages is restricted to senior members of the Editorial Department only according to access permissions.

### **SNL Documents**

SNL receives SEC documents via an FTP feed from a third-party provider. These documents are automatically loaded into the SNL document system and appear on SNLi in substantially the same format as on the SEC's EDGAR website.

Non-SEC documents are scanned and/or loaded into the SNL document system by the Filing Services Department at SNL. These documents must meet standards regarding image quality and completeness before they can be approved and set to display on the live website.

## **SNL Financial LC Privacy Statement**

### ***Information Sharing Practices***

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SNL handles many of the marketing initiatives of its affiliates, which includes the Center for Financial Education. All information gathered by SNL Financial LC may be shared with these affiliates. Beyond SNL's affiliate organizations, SNL may, on occasion, rent or sell individual user contact information (name, address, etc.) to other organizations. In no case will SNL disclose which pages and documents users download, which companies are stored in their portfolios, or any other information pertaining to an individual's usage of this site.

SNL Financial LC reserves the right to share information gathered, in its aggregate form, with current and potential advertisers.

With respect to SNL's IRConsole products, SNL does not release personally identifying information about IRWebLink users, users' activities and/or preferences, to other companies wishing to contact users about products or services. We may, however, provide third parties with collective profiles of our user groups and their activities and preferences. Such collective profiles may also be disclosed in describing our site and services to prospective partners and for other lawful purposes.

IRConsole user information may be provided to the company for which we are under contract to provide investor relations services. We do not disclose user information about a company's investors to the other companies for which we provide investor relations services.

### ***Choice/Opt Out***

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The SNL Interactive products sites allow users the option of opting out of receiving communications from SNL Financial and its affiliates. Users may opt out of receiving general industry and product updates via e-mail by clicking on the designated opt out link

found on general industry and product e-mail updates. Users may alter their contact information at any time by editing their Personal Profile on the Your Account page.

Users who wish to opt out of receiving promotional offers from SNL Financial and its affiliates may do so by sending an email to [Interactive@snl.com](mailto:Interactive@snl.com).

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### ***IP addresses***

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SNL Financial logs IP addresses of all visitors to SNL's Internet products to help identify problems with our platform and to assist in the administration of our web site.

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### ***Cookies***

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SNL's web sites utilize cookies in order to recognize users and to maintain their customized preferences.

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### ***Registration***

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In order to view the full contents of SNL's site, users are required to complete a registration form and/or order a subscription. SNL requires users to provide contact information (such as name and e-mail address) and fill out a survey. SNL may use customer contact information to distribute company information and promotional materials. Contact information is also used to contact the user when necessary. Survey results help SNL categorize the site's users, and tailor its product offerings accordingly. SNL will use e-mail address to send users certain confidential information, such as their username and password.

SNL also uses e-mail as a means of notifying subscription users of new content on its SNL Interactive sites. Users may change their preferences or opt out of e-mail notifications on the Personal Profile section of the Your Account page. Both subscribers and guest users have the option of receiving general industry and product updates. All users have the option of opting out of general industry and product e-mail updates at the time of registration.

Financial information (such as a credit card number) is required of those users who purchase any SNL Interactive subscriptions over the Internet. Financial information that is collected is only used for billing purposes and is then deleted.

Customers who wish to share the access privileges of a pre-existing account must provide the proper Account ID during registration.

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### ***Links***

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SNL maintains links to other sites on the Internet. SNL Financial LC is not responsible for the privacy practices or the content of these non-SNL web sites.

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### ***Privacy and Infrastructure***

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User's personal profile information can only be viewed after logging in with a valid username and password. Since username and passwords are sent via e-mail, anyone with access to the receiving e-mail account may have access to the username and password.

As with any information transmitted over the Internet, the security of a data transmission to and from SNL Financial can not be guaranteed. However, SNL Financial LC has security measures in place to help prevent the loss, misuse, or unauthorized alteration of information from our customers. Our security measures include the use of SSL (Secure Socket Layer) technology for credit card submissions.

### ***Third Party Security Auditing***

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SNL periodically participates in third party security audits for its infrastructure and online products. This testing includes but is not limited to: penetration testing, code reviews, and web application testing. SNL's last security audit was performed by Plynt in May of 2008.

### **Questions?**

If you have questions about the **SNL Privacy and Security Policy**, you may contact your account manager and or sales rep