

In Respect of CytoBase

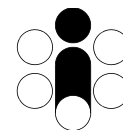
Report to the Information and Privacy Commissioner of Ontario Three-
Year Review as a Prescribed Person under *PHIPA*
Year of Submission (2022)

INDICATORS

August 2, 2022

Inscyte Corporation

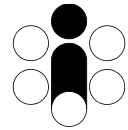
Dr. Allan Seidenfeld– President
Jack Golabek – Privacy Officer



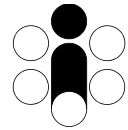
Privacy, Security and Other Indicators

Part 1 – Privacy Indicators

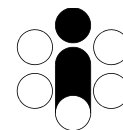
Categories	Privacy Indicators																								
General Privacy Policies, Procedures and Practices	<p>Inscyte Corporation has a consolidated set of policies and procedures that apply to Inscyte Corporation, and by extension, Inspirata. since Inspirata acts as Agent for Inscyte in respect to CytoBase.</p> <p>The “Privacy & Security Policies and Procedures Manual” addresses the requirements in Appendix “B” of the <i>IPC Manual for the Review and Approval of Prescribed Persons and Prescribed Entities</i>.</p> <p>The privacy policies and procedures were reviewed in February 2020, September 2020, February 2021, and August 2021 and continue to be reviewed at regular annual privacy/security review meetings. The results of these reviews were as follows:</p>																								
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<p>Each amended and/or new policy procedure was communicated to Inscyte’s Agent Inspirata on the date/time of each joint review meeting through written minutes and action items recorded at each meeting.</p>																									



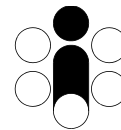
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	<p>No changes were recommended or made to privacy policies as a result of the above reviews. Consequently, communication materials available to the public or other stakeholders were not amended as a result of these reviews.</p> <p>The next review of privacy/security procedures and practices is scheduled for August 2022</p>
Collection	<p>Since the last review by the IPC in 2019 no data linkages with third parties were performed and no new data linkages were contemplated. As a result, CytoBase consist of one data holding, namely, cervical cancer screening reports performed by laboratories participating in the CytoBase program. These cervical cancer screening reports consist of:</p> <p>CytoBase Database This is the main CytoBase database. CytoBase RFC Manual change requests (data corrections). Archived HL7 Logs Archived report transmission logs on disk.</p> <p>These are held in accordance with the Statement of Purpose, Collection, Use, and Retention for CytoBase. CytoBase is the only data holding and no amendments have been made to the purpose of this holding since the last review by the IPC. This data holding has been reviewed by Inscyte since the last review by the IPC.</p>
Use	<p>Inscyte Corp. has no employees that work with CytoBase patient-level data. Inspirata acts as Agent for Inscyte with respect to the day-to-day operations and maintenance of CytoBase. Only designated members of Inspirata staff are permitted to work with the information in CytoBase and are limited to specific and restricted roles. These roles do not permit use of CytoBase PHI for research purposes. At the time of writing seven (7) staff members of Inspirata were authorized to work with CytoBase patient-level data.</p> <p>Aggregated statistics can be produced from CytoBase data. However, no statistical publications have been made since the last IPC review in 2019. Further, no requests for use of CytoBase PHI for research purposes were received or granted since the last review by the IPC in 2019.</p>
Transfer and Disclosure	<p>Inscyte Corporation discloses personal health for non-research purposes to the following entities under the terms and conditions of their respective data sharing agreements:</p> <ol style="list-style-type: none"> 1. Patient test results are disclosed to Ontario Health on a daily basis for the purposes of the Ontario Cervical Cancer Screening Program.



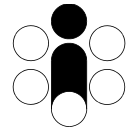
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	<ol style="list-style-type: none"> 2. Patient test results are disclosed on an ad-hoc real-time basis to participating medical laboratories for the purpose of improving quality in the interpretation of new test specimens and for ensuring patients with abnormal screening results are followed-up appropriately. 3. Patient test results are disclosed ad-hoc to registered authorized users of the “CytoBase for Clinicians” online service for the purpose of improving patient care. <p>Outside of the above modalities, no other requests for the disclosure of personal health information for non-research purposes were received by Inscyte since the last IPC review in 2019.</p> <p>No new third-party data sharing agreements have been executed since the IPC review in 2019.</p> <p>Inscyte did not receive requests for disclosure of personal health information for research purposes, and no disclosures of personal health information have been made for research purposes since the last IPC review in 2019.</p> <p>Inscyte did not receive requests for aggregate and/or de-identified information and has not disclosed aggregate or de-identified information for research since the last IPC review in 2019 and has not entered into any research agreements.</p> <p>As there were no disclosures of aggregate and/or de-identified information, Inscyte has had no acknowledgements or agreements from persons to whom such information was disclosed since the last review by IPC in 2019.</p>
Data Sharing Agreements	<p>Inscyte Corp. has the following data sharing agreements in place for the collection, use and disclosure of personal health information (there is only one agreement in effect per organization).</p> <p>Laboratories (collection & transfer)</p> <ol style="list-style-type: none"> 1. LifeLabs 2. Dynacare Health 3. Medical Laboratories of Windsor <p>These agreements have not changed since the IPC review of 2019 and remain in effect.</p> <p>Healthcare Service Providers (disclosure/use)</p> <ol style="list-style-type: none"> 1. Ontario Health



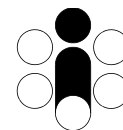
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	<p>The data sharing agreement with Ontario Health has not changed since the IPC review of 2019 and remains in effect.</p> <p>No new data sharing agreements have been executed between Inscyte and third parties since the last review by the IPC in 2019.</p>
<p>Agreements with Third Party Service Providers</p>	<p>Inscyte Corp. has a contractual agreement in place with Inspirata Canada Inc. for the on-going operations and maintenance of the CytoBase database and data collection network. This agreement has not changed since the last IPC review in 2019. This is the only third-party service agreement that Inscyte Corporation has in effect.</p>
<p>Data Linkage</p>	<p>No data linkages have been performed, requested or approved since the last review by the IPC in 2019.</p>
<p>Privacy Impact Assessments</p>	<p>The most recent Privacy Impact Assessment (PIA) was conducted and completed October 31, 2013. This PIA focused on the CytoBase system and database. No recommendations for changes were made as the privacy and security controls, policies and procedures in place were deemed adequate and appropriate.</p> <p>Review of the existing Privacy Impact Assessment was conducted at each annual privacy and security review meeting in February 2020, September 2020, February 2021, and August 2021. After each review a determination was made that further PIAs were not required as the operational infrastructure of CytoBase, and the collection, use and disclosure of CytoBase information had not changed and did not warrant a new or revised PIA. As such, since the last review by IPC in 2019:</p> <ul style="list-style-type: none"> • No new PIAs were completed • No PIAs were undertaken but not completed • No new PIAs have been scheduled



<p>Privacy Audit Program</p>	<p>Inscyte’s policies require a privacy program audit to be performed at least on an annual basis. Since the last review by the IPC in 2019, formal privacy/security reviews have been implemented; scheduled annually, usually in August, with recorded minutes, recommendations, and action items. Each meeting agenda includes review of the following items:</p> <ol style="list-style-type: none"> 1. Log of Data Holdings 2. Log of Authorized Personnel 3. Log of Authorized Access to PHI 4. Physical Access Logs 5. Password Policies 6. Log of Privacy Complaints 7. Log of Privacy Breaches 8. Log of Security Breaches 9. Log of PHI Transfers 10. Log of Privacy Training 11. Log of System Configuration Changes (Patch Management) 12. Data Sharing Agreements 13. Staff Confidentiality Agreements 14. Risk Register (review/identification/resolution of risks) 15. Business Continuity Plan (Disaster Recovery) 16. Requirements for updates to TRA/PIA 17. Requirements for updates to Data Sharing and Third-Party Agreements 18. Consolidated Log of Recommendations (action items) <p>Reviews of agents granted approval to access and use PHI were conducted by Inscyte and its agent Inspirata in February 2020, September 2020, February 2021, and August 2021 and continue to be reviewed at regular annual privacy/security review meetings. The results of these reviews were as follows:</p> <p>Audits of Agents Granted Approval to Access and Use PHI</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Review Date</th> <th style="text-align: left;">Recommendations</th> <th style="text-align: left;">Actions</th> <th style="text-align: left;">Action Completed</th> </tr> </thead> <tbody> <tr> <td>Feb 2020</td> <td>No recommended changes.</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Sept 2020</td> <td>No recommended changes.</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Feb 2021</td> <td>No recommended changes.</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Aug 2021</td> <td>No recommended changes.</td> <td>N/A</td> <td>N/A</td> </tr> </tbody> </table> <p>No other privacy audits were conducted since the last review by IPC in 2019.</p>	Review Date	Recommendations	Actions	Action Completed	Feb 2020	No recommended changes.	N/A	N/A	Sept 2020	No recommended changes.	N/A	N/A	Feb 2021	No recommended changes.	N/A	N/A	Aug 2021	No recommended changes.	N/A	N/A
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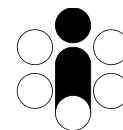


	<p>Other than Inspirata, there are no other agents granted approval to access and use personal health information. Further, Inscyte’s agent Inspirata is not granted approval to access and use personal health information; rather, certain designated staff of Inspirata are permitted to access PHI only as necessary for purposes of troubleshooting, quality control and system maintenance of CytoBase.</p> <p>Recommendations resulting in changes to policies and procedures are reflected in updates to Inscyte’s “Privacy & Security Policies and Procedures Manual” and are communicated to its Agent Inspirata by the privacy officer and security officer via email notification and at the next scheduled privacy/security training and awareness session (held quarterly). The date of notification is noted in the policy description as the new or updated policy came into effect (the effective date).</p> <p>Inscyte’s Agent Inspirata performs a privacy spot-audit every month to monitor and detect potential breaches of privacy within its operating environment. The audit program consists of scanning randomly selected workstations, laptops, and servers on a monthly basis to detect healthcare related data containing patient identifiers which may have been inadvertently stored in inappropriate locations. In addition to audits of workstation and server data files, Inspirata technicians also review server process logs and firewall activity logs on a weekly basis to detect intrusion attempts and potential breaches of security or privacy.</p> <p>A log is maintained of all computer scans, the date of the scan, the person performing the scan and the results of the scan.</p> <p>The results of the above privacy audits have revealed no significant vulnerabilities or breaches of privacy that would require specific recommendations or actions to be taken. The results are reviewed at annual privacy/security review meetings to decide on measures to be taken, if any, and are recorded in the recommendations and actions items of the minutes of the meeting.</p>
<p>Privacy Breaches</p>	<p>Inscyte Corp. has not received any notifications of privacy breaches or suspected privacy breaches since the last review by the IPC in 2019.</p>
<p>Privacy Complaints</p>	<p>Inscyte Corp. has not received any privacy complaints since the last review by the IPC in 2019.</p>

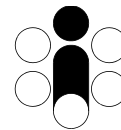


Part 2 – Security Indicators

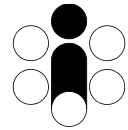
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<p>General Security Policies and Procedures</p>	<p>Inscyte Corporation has a consolidated set of policies and procedures that apply to Inscyte Corporation, and by extension, Inspirata since Inspirata acts as Agent for Inscyte in respect to CytoBase.</p> <p>The “Privacy & Security Policies and Procedures Manual” addresses the requirements in Appendix “B” of the <i>IPC Manual for the Review and Approval of Prescribed Persons and Prescribed Entities</i>.</p> <p>The security policies and procedures were reviewed in February 2020, September 2020, February 2021, and August 2021 and continue to be reviewed at regular annual privacy/security review meetings. The following is a summary of recommendations made, communicated to Inspirata and actioned since the last IPC review.</p> <table border="1" data-bbox="565 856 1404 1507"> <thead> <tr> <th>Review Date</th> <th>Recommendations</th> <th>Actions</th> <th>Action Completed</th> </tr> </thead> <tbody> <tr> <td>Feb 2020</td> <td>Add additional servers and desktops to quarterly scans</td> <td>Review</td> <td>Completed</td> </tr> <tr> <td>Sept 2020</td> <td>Keep BCP updated</td> <td>Updated</td> <td>Completed</td> </tr> <tr> <td>Feb 2021</td> <td>No recommendations</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Aug 2021</td> <td>No recommendations</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>July 2022</td> <td>Amended policy to require privacy/security training twice per year. Amended policy to permit secure cloud-based storage of backup media. Added policy to implement automated system monitoring and alerts.</td> <td>Changes to be reviewed at upcoming privacy and security policy review August 2022.</td> <td>Pending</td> </tr> </tbody> </table> <p>Each amended and/or new policy procedure was communicated to Inscyte’s Agent Inspirata on the date/time of each joint review meeting through written minutes and action items recorded at each meeting.</p> <p>Inscyte’s Privacy & Security Policies and Procedures manual was last amended on July 25, 2022 for internal distribution to its Agent Inspirata. It was deemed that the changes to the security policies and procedures did not materially affect the public or other stakeholders. Consequently,</p>	Review Date	Recommendations	Actions	Action Completed	Feb 2020	Add additional servers and desktops to quarterly scans	Review	Completed	Sept 2020	Keep BCP updated	Updated	Completed	Feb 2021	No recommendations	N/A	N/A	Aug 2021	No recommendations	N/A	N/A	July 2022	Amended policy to require privacy/security training twice per year. Amended policy to permit secure cloud-based storage of backup media. Added policy to implement automated system monitoring and alerts.	Changes to be reviewed at upcoming privacy and security policy review August 2022.	Pending
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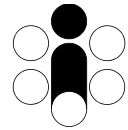
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	<p>communication materials available to the public or other stakeholders were not amended as a result of these reviews.</p> <p>The next review or privacy/security procedures and practices is scheduled for August 2022.</p>																				
Physical Security	<p>Inscyte’s agent Inspirata monitors and reviews computerized logs of physical access to premises and locations within premises that contain personal health information. These logs are reviewed at minimum on a monthly basis, but in practice on a weekly basis. In the event that a breach of security is detected or suspected, Inscyte’s policies require the breach to be contained and reported to the Security Officer and Privacy Officer at the first available opportunity.</p> <p>Reviews of agents granted access to the premises and locations within the premises where records of personal health information are retained are carried out on an annual basis by Inscyte and its agent Inspirata. Since the last review by IPC in 2019, review meetings were held in February 2020, September 2020, February 2021, and August 2021.</p> <p>Review of Agents Granted Access to Premises</p> <table border="1" data-bbox="565 995 1412 1310"> <thead> <tr> <th data-bbox="565 995 711 1058">Review Date</th> <th data-bbox="711 995 1019 1058">Recommendations</th> <th data-bbox="1019 995 1250 1058">Actions</th> <th data-bbox="1250 995 1412 1058">Action Completed</th> </tr> </thead> <tbody> <tr> <td data-bbox="565 1058 711 1121">Feb 2020</td> <td data-bbox="711 1058 1019 1121">No recommended changes.</td> <td data-bbox="1019 1058 1250 1121">N/A</td> <td data-bbox="1250 1058 1412 1121">N/A</td> </tr> <tr> <td data-bbox="565 1121 711 1184">Sept 2020</td> <td data-bbox="711 1121 1019 1184">No recommended changes.</td> <td data-bbox="1019 1121 1250 1184">N/A</td> <td data-bbox="1250 1121 1412 1184">N/A</td> </tr> <tr> <td data-bbox="565 1184 711 1247">Feb 2021</td> <td data-bbox="711 1184 1019 1247">No recommended changes.</td> <td data-bbox="1019 1184 1250 1247">N/A</td> <td data-bbox="1250 1184 1412 1247">N/A</td> </tr> <tr> <td data-bbox="565 1247 711 1310">Aug 2021</td> <td data-bbox="711 1247 1019 1310">No recommended changes.</td> <td data-bbox="1019 1247 1250 1310">N/A</td> <td data-bbox="1250 1247 1412 1310">N/A</td> </tr> </tbody> </table>	Review Date	Recommendations	Actions	Action Completed	Feb 2020	No recommended changes.	N/A	N/A	Sept 2020	No recommended changes.	N/A	N/A	Feb 2021	No recommended changes.	N/A	N/A	Aug 2021	No recommended changes.	N/A	N/A
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Security Audit Program	<p>While Inscyte’s policies state that CytoBase system control logs and audit logs shall be reviewed on a monthly basis, we have since moved to automated processes for real-time monitoring of system controls, audit logs, and network activity to trigger alerts of unusual activity or degradation in performance.</p> <p>Inscyte’s policies require that the security program be reviewed at least once per year. Since the last review by the IPC in 2019, formal privacy/security reviews have been implemented; scheduled annually, usually in August with recorded minutes, recommendations, and action items.</p> <p>The meeting agenda includes review of the following items:</p>																				



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	<ol style="list-style-type: none"> 1. Log of Data Holdings 2. Log of Authorized Personnel 3. Log of Authorized Access to PHI 4. Physical Access Logs 5. Password Policies 6. Log of Privacy Complaints 7. Log of Privacy Breaches 8. Log of Security Breaches 9. Log of PHI Transfers 10. Log of Privacy Training 11. Log of System Configuration Changes (Patch Management) 12. Data Sharing Agreements 13. Staff Confidentiality Agreements 14. Risk Register (review/identification/resolution of risks) 15. Business Continuity Plan (Disaster Recovery) 16. Requirements for updates to TRA/PIA 17. Requirements for updates to Data Sharing and Third-Party Agreements 18. Consolidated Log of Recommendations (action items) <p>The following is a summary of recommendations made, communicated, and actioned since the last IPC review in 2019.</p> <table border="1" data-bbox="565 1062 1414 1314"> <thead> <tr> <th>Review Date</th> <th>Recommendations</th> <th>Actions</th> <th>Action Completed</th> </tr> </thead> <tbody> <tr> <td>Feb 2020</td> <td>Add additional servers and desktops to quarterly scans</td> <td>Review</td> <td>Completed</td> </tr> <tr> <td>Sept 2020</td> <td>Keep BCP updated</td> <td>Updated</td> <td>Completed</td> </tr> <tr> <td>Feb 2021</td> <td>No recommendations</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Aug 2021</td> <td>No recommendations</td> <td>N/A</td> <td>N/A</td> </tr> </tbody> </table> <p>The above recommendations were communicated to Inscyte’s Agent Inspirata and were scheduled for implementation before the next annual review. Recommendations resulting in changes to policies and procedures are reflected in updates to Inscyte’s “Privacy & Security Policies and Procedures Manual” and are communicated to its Agent Inspirata by the privacy officer and security officer via email notification and at the next scheduled privacy/security training and awareness session. The date of notification is noted in the policy description as the new or updated policy came into effect (the effective date).</p> <p>Since the last review by the IPC in 2019, patches have been applied to the CytoBase computing infrastructure in accordance with Inscyte’s patch management policies and procedures. This has included all Microsoft Windows patches and Oracle RDBMS as up to June 11, 2022</p>	Review Date	Recommendations	Actions	Action Completed	Feb 2020	Add additional servers and desktops to quarterly scans	Review	Completed	Sept 2020	Keep BCP updated	Updated	Completed	Feb 2021	No recommendations	N/A	N/A	Aug 2021	No recommendations	N/A	N/A
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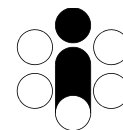


Categories	Security Indicators
	<p>(at the time of writing). All patches have been logged in the Log of Configuration Changes and Patches.</p> <p>In addition to annual privacy/security reviews, Inspirata performs security audits on a regular basis as follows:</p> <ul style="list-style-type: none"> • Physical access logs are reviewed at minimum monthly but weekly in practice • Internet facing firewall traffic patterns are monitored automatically • CytoBase data transaction logs are monitored automatically • CytoBase for Clinicians web server logs are monitored automatically • CytoBase for Clinicians user activity logs are monitored automatically • Network activity is monitored automatically • Network server vulnerability scans are run quarterly <p>The results of the above security audits have revealed no significant vulnerabilities or breaches of security that would require specific recommendations or actions to be taken. The results are reviewed at annual privacy/security review meetings to decide on measures to be taken, if any, and are recorded in the recommendations and actions items of the minutes of the meeting.</p>
<p>Information Security Breaches</p>	<p>Since the last review by the IPC in 2019, there have been no detected security breaches in respect of CytoBase.</p>



Part 3 – Human Resources Indicators

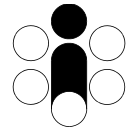
Categories	Human Resource Indicators				
<p>Privacy Training and Awareness</p>	<p>All agents of Inscyte have received at least two privacy awareness training session since the last review by the IPC in 2019.</p> <p>Training sessions are conducted at Inspirata’s all-staff meetings, which are scheduled on a nominally quarterly basis and cover both privacy and security matters. Communications to agents related to privacy are delivered on the dates of these meetings. Since the last review by the IPC in 2019, training sessions have been held in the following months:</p> <table border="0"> <tr> <td>February 2020</td> <td>19 Employees (HIPAA Awareness)</td> </tr> <tr> <td>May 2022</td> <td>21 Employees (HIPAA Awareness)</td> </tr> </table> <p>Communications to agents by Inscyte in relation to privacy matters are made at the privacy training sessions.</p> <p>There are no employees of Inspirata or Agents of Inscyte that have not received privacy and security awareness training. Seven (7) employees of Inspirata are authorized to work with CytoBase.</p> <p>There have been no new hires authorized to work with CytoBase since the last review by the IPC in 2019.</p>	February 2020	19 Employees (HIPAA Awareness)	May 2022	21 Employees (HIPAA Awareness)
February 2020	19 Employees (HIPAA Awareness)				
May 2022	21 Employees (HIPAA Awareness)				
<p>Security Training and Awareness</p>	<p>All agents of Inscyte have received at least two security awareness training session since the prior review by the IPC in 2019.</p> <p>Training sessions are conducted at Inspirata’s all-staff meetings, which are scheduled on a nominally quarterly basis, and cover both privacy and security matters. Communications to agents related to security are delivered on the dates of these meetings. Since the last review by the IPC in 2019, training sessions were held on the following dates:</p> <table border="0"> <tr> <td>February 2020</td> <td>19 Employees (HIPAA Awareness)</td> </tr> <tr> <td>May 2022</td> <td>21 Employees (HIPAA Awareness)</td> </tr> </table> <p>Communications to agents by Inscyte in relation to security matters are made at the security training sessions.</p> <p>There are no employees of Inspirata or Agents of Inscyte that have not received privacy and security awareness training. Seven (7) employees of Inspirata are authorized to work with CytoBase. There have been no new hires authorized to work with CytoBase since the last review by the IPC in 2019.</p>	February 2020	19 Employees (HIPAA Awareness)	May 2022	21 Employees (HIPAA Awareness)
February 2020	19 Employees (HIPAA Awareness)				
May 2022	21 Employees (HIPAA Awareness)				



Categories	Human Resource Indicators
Confidentiality Agreements	<p>All agents of Inscyte (including all employees of Inspirata) as a condition of employment or contract, execute a signed and witnessed “Personal Health Information Confidentiality and Non-Disclosure Agreement” with respect to the handling of personal health information. There are no Agents of Inscyte who have not executed a confidentiality agreement.</p> <p>These agreements refer to the Act as the prevailing legislation, the privacy & security policies and procedures, and stipulate the consequences of breach. At present all employees of Inscyte’s Agent Inspirata have executed agreements. These agreements are not currently re-executed on an annual basis; however, all agents are reminded of their signed agreements and obligations at Privacy & Security Awareness training sessions.</p>
Termination or Cessation	<p>Since the last review by the IPC in 2019, Inscyte Corp. was notified by its agent Inspirata of the termination of two individuals that had been authorized to work with CytoBase. One in November 2019 and the other in November 2020. Inspirata has not replaced these individuals and no additional staff have been hired to work with CytoBase.</p>

Part 4 – Organizational Indicators

Categories	Organizational Indicators
Risk Management	<p>Inscyte Corporation’s policy states that the risk register will be reviewed at least once per year. Since the last review by the IPC in 2019, annual privacy/security review meetings have been established at which the risk register is reviewed.</p> <p>In addition, Inscyte’s Agent Inspirata, reviews risk to CytoBase on an on-going basis at weekly technical support departmental meetings. The corporate risk register was reviewed at each annual privacy/security review meeting in February 2020, September 2020, February 2021, and August 2021. The risk register is updated as required.</p> <p>Since the last review by the IPC in 2019, the risk register was updated in Dec 2021 as follows:</p> <ul style="list-style-type: none"> • Security Risk: Log4j Vulnerability: No action was needed as Tomcat and Oracle Database do not use log4j libraries.
Business Continuity and Disaster Recovery	<p>Inspirata’s business continuity plan incorporates the recovery of Inscyte Corporation’s CytoBase system since it is hosted on Inspirata’s</p>



Categories	Organizational Indicators
	<p>computing infrastructure. Inspirata’s business continuity plan is updated on an on-going basis in conjunction with infrastructure modifications, upgrades, or expansions.</p> <p>Inscyte does not have a policy stipulating a specific frequency at which the disaster recovery plan is to be tested. However, Inscyte requires that a backup and restore procedure is to be carried out to verify disaster recovery on a component level each time a significant hardware and/or software change is made to the CytoBase computing infrastructure. It is the responsibility of the Operations Manager of Inspirata to ensure that tests of the disaster recovery plan, in whole or in part, are performed at the earliest opportunity whenever the computing infrastructure is significantly changed.</p> <p>Updated versions of Inspirata’s business continuity plan were published internally in May 2021. Changes to the plan consisted of updated technical specifications and configurations of hardware and software for the CytoBase system, as well as backup images of virtual servers.</p> <p>A test of the disaster recovery plan was conducted in April 2021 with successful results.</p>