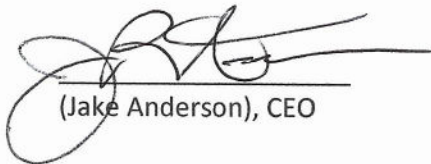




Data Security Policy

SEAM is committed to data security and protecting our clients assets.

- SEAM prohibits unauthorized individuals from accessing or handling equipment containing data.
- SEAM has assigned the Compliance Engineer to be the Data Protection Representative with overall responsibility and authority for SEAM's data security and legal compliance, including oversight of all related duties otherwise assigned.
- SEAM mandates reporting of known and suspected breaches of security and data to the Data Protection Representative.
- SEAM requires completed training and confidentiality agreements prior to individual authorization to handle equipment containing data.
- Employees found to violate this policy will be subject to disciplinary action that could include immediate dismissal.
- Employees found to violate this policy or found to have conducted a criminal act related to data security will be held financially and criminally responsible for damages and/or material loss to SEAM and its clients to the extent allowed by law.



(Jake Anderson), CEO

4/24/23
Date