



## Fields Auto Group Compliance

### Service Provider Risk Assessment

Questionnaire requested by **FIELDS BMW, BMW of Asheville, Orlando MINI, FIELD'S MOTOR CARS OF FLORIDA, FIELDS BMW - LAKELAND, FIELDS LEXUS GLENVIEW, FIELDS MOTORCARS ASHEVILLE- MERCEDES, FIELDS MOTORCARS ORANGE PARK, FIELDS VOLVO OF HIGHLAND PARK, LEXUS OF JACKSONVILLE, LEXUS OF ORANGE PARK, Mercedes-Benz of Jacksonville.**

Name of Person Completing This  
Questionnaire  
Roger Fugett

Service Provider Name  
Data Clover

Date Completed  
06/09/2023

|                                                                                                                                                                   |     |                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Are you an employee or authorized representative of this vendor/company? Indicate the Person's Name in the comments.                                           | Yes | Person's Name: Roger Fugett                                                                                                                                                                                                                                                                                                      |
| 2. Does your company offer software applications as part of its services?                                                                                         | Yes | DataClover does not offer installed software applications, but instead software-as-a-service tools and online web portals.                                                                                                                                                                                                       |
| 3. Is client data encrypted at rest and in transit? If not, why not?                                                                                              | Yes |                                                                                                                                                                                                                                                                                                                                  |
| 4. Has your company experienced a data breach in the past 12 months that affected customers' personal information?                                                | No  |                                                                                                                                                                                                                                                                                                                                  |
| 5. Does your company have insurance coverage for a data breach that may involve our customer information that your company acquires while doing business with us? | Yes |                                                                                                                                                                                                                                                                                                                                  |
| 6. Does your company require security awareness training for all employees? If so, please answer how often it is provided in the comments section.                | No  | Security Training Frequency: As part of employee onboarding, company security awareness is communicated to the employee and is provided with DataClover's Information Security Policy. The employee enters into an agreement as terms of employment with DataClover to comply with the policies outlined in the Security Policy. |
| 7. Does your company monitor for the effectiveness of employee security training by testing your users with simulated attacks?                                    | No  |                                                                                                                                                                                                                                                                                                                                  |
| 8. Does your company have a process for restricting access to customer files on a need-to-know basis?                                                             | Yes |                                                                                                                                                                                                                                                                                                                                  |
| 9. Do you have a written information security program?                                                                                                            | Yes |                                                                                                                                                                                                                                                                                                                                  |
| 10. Does your company conduct annual risk assessments that assess electronic, physical, and administrative information safeguards?                                | Yes |                                                                                                                                                                                                                                                                                                                                  |
| 11. Does your company have systems in place to securely dispose of documents that have personal identifiable information on them?                                 | Yes |                                                                                                                                                                                                                                                                                                                                  |
| 12. Does your company have systems in place to restrict access to files/documents containing customers personal information to those with proper authorization?   | Yes |                                                                                                                                                                                                                                                                                                                                  |
| 13. Does your company have due diligence processes and procedures for vetting subcontractors, including having them sign                                          | Yes |                                                                                                                                                                                                                                                                                                                                  |



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processing agreements that are compliant with applicable federal and state laws?

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| 14. Has your company performed penetration testing of its systems within the past 12 months?                                                                | No                                                                                                                                                                                                                            |
| 15. Has your company conducted a vulnerability assessment of your systems within the past 6 months?                                                         | No                                                                                                                                                                                                                            |
| 16. Does your company maintain end-of-life or unsupported operating systems or software? If so, are these systems used to manage or maintain customer data? | No                                                                                                                                                                                                                            |
| 17. Does your company regularly patch or update systems and third-party software and monitor for noncompliance?                                             | Yes                                                                                                                                                                                                                           |
| 18. Does your company have a written incident response plan in the event of a security breach?                                                              | Yes                                                                                                                                                                                                                           |
| 19. Does your company require users to create complex passwords with 9 characters or greater?                                                               | Yes                                                                                                                                                                                                                           |
| 20. Does your company prohibit shared logins?                                                                                                               | Yes                                                                                                                                                                                                                           |
| 21. Does your company require multi-factor authentication to log into your systems?                                                                         | No<br>Many of the internal applications require multi-factor authentication. All users accessing the company's software-as-a-service solution are authenticated using a complex user identification and password combination. |
| 22. Do you have an account lockout policy?                                                                                                                  | Yes                                                                                                                                                                                                                           |

Date  
6/8/2023

Signature of Authorized Agent of Service Provider  
Roger Fugett

Title  
Head of Technology  
& Operations

Submitted on June 8, 2023 at 5:09 PM by 73.106.164.141.