

## SERVER ACCESS POLICY

AbelConn provides a Secure File Transfer Protocol (SFTP) site for the benefit of our company, to facilitate document transfers with other parties, and to ensure proper handling of any technical data. This site is intended for use only by AbelConn employees (“Employees”) and those outside third parties specifically authorized by AbelConn (“Third-Parties”) during the normal course of business for uploading and transferring data between Employees and Third-Parties (collectively “Users”). Whenever the context may require, any pronouns used in this policy shall include the corresponding masculine, feminine or neuter forms, and the singular form of nouns and pronouns shall include the plural, and vice versa.

By entering the SFTP site, all Users are bound by the following terms and acknowledge that:

1. Users will only use this site on behalf of the company they represent.
2. Users will not upload any inappropriate content, including but not limited to: viruses, Trojan horse worms, other harmful or damaging software or code, pornography, material that violates intellectual or proprietary rights of others, or any other inappropriate content.
3. Users acknowledge that the site may contain technical data, including Controlled Unclassified Information (“CUI”).
4. Users agree to abide by U.S. and local laws regarding export-controlled information and CUI, and shall not provide such information to persons not authorized by law to receive it.
5. User access may be limited in duration and any files that remain after such duration may be automatically deleted by the system and unrecoverable.
6. If Users stop being employed by their current employer, the User’s access to this site shall be immediately terminated.
7. Users will not abuse the system. Examples of abuse include, but are not limited to,:
  - a. Unauthorized sharing of login credentials;
  - b. Intentionally attempting to circumvent security measures;
  - c. “Testing the fences” to identify system security measures, configuration, or setup information;
  - d. Using the service in a way that differs from the rules promulgated above.
8. AbelConn may in its sole discretion and without notice to any party, through any means it determines necessary, terminate the access of any party that it deems to have violated the provisions of any clause herein (“Abusive Activity”). AbelConn may further forward such Abusive Activity to law enforcement or to the employer of the terminated party.

9. All accounts not accessed for a period exceeding 90 days may be suspended without notice.
10. Folders and files not accessed within 90 days may be automatically deleted without notice.
11. Users will immediately notify their AbelConn point of contact for any issues arising with their use of the SFTP site.
12. AbelConn may, without notice, conduct an audit upon AbelConn's SFTP site and/or its contents to ensure compliance with this policy and with the relevant laws and regulations
13. AbelConn reserves the right to modify this policy without notice.