



# Frequently Asked Questions and Answers





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October 2022.

**Corporate**

6475 Camden Avenue, Suite 207 (408) 997-5525  
San Jose, CA 95120  
[www.pathsoftware.com](http://www.pathsoftware.com)

**Support and Sales**

3500 Maple Avenue, Suite 500 (866) 268-4201  
Dallas, TX 75219 (866) 302-2599  
[sales@pathsoftware.com](mailto:sales@pathsoftware.com)  
[support@pathsoftware.com](mailto:support@pathsoftware.com)

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# Introduction

## What does Path do?

Path is a cloud-based Loan Origination Software (LOS) that generates loan data, lock data, product pricing, AUS findings, disclosure documents and compliance assurances. All the loan data is reconciled internally via crafted workflows. Every single step in the loan cycle—from origination to closing—is performed within Path by various roles and users, such as Loan Originator, Underwriter, Processor, Closer, etc.

Path delivers work to each user's workstation at the correct point in the loan cycle to facilitate the efficient execution of specific functions. Path allows simultaneous operations in parallel workflows and eliminates the tedious back-and-forth that frequently plagues production efficiency and consumes valuable resources. Path also provides full transparency so users can see loan status, what functions were performed, by whom and when. Path promotes accountability.

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## Cost & Implementation

### What is the pricing structure?

Path is offered with a one-time implementation fee, with extensive hands-on training and coaching from Path's Professional Services Group (PSG), who will walk clients step-by-step through the entire implementation process and answer any concerns and questions they may have.

### What is the pricing structure throughout the contract?

Path will enable clients to realize cost and service efficiencies through the full term of the contract by virtue of charging a one-time implementation fee. Afterwards, only monthly user fees, monthly PPE, and custom AUS fees will apply, which are negotiable at the start of the term to remain constant throughout the term.

### What to expect for implementation?

Path PSG will provide a custom implementation timeline with corresponding responsibilities and deliverables after a thorough understanding of the client's operation and the preferred partners/vendors have been reviewed and confirmed by PSG. Path Sales can provide a mock implementation template for demonstration purposes, upon request.

After the client and PSG have agreed upon workflow(s), vendor integration, and preferred partners, the implementation clock starts - we commit to a 90-day period from final agreement to the go-live date.

PSG will provide setup, configuration, and user training. Our training curriculum is offered onsite as well as online via webinar.

### What are the implementation steps?

- Step 1 – Discovery: Interview with the client's team members to understand their current and desired mortgage process.
- Step 2 – Setup: Collect all information that is critical to system configuration.
- Step 3 – Testing: A mandatory testing time of at least 40 hours with the implementation team to ensure everything is running smoothly.
- Step 4 – Go Live: During go-live, Path implementation and support teams will provide hands-on support for users that need assistance and answer any questions.

**What type of training to expect?**

Path PSG will train new clients and work closely with the client's chosen system administrator for the successful handoff of regular operational oversight. All this training, coaching, and troubleshooting expertise are covered in the sales and implementation cost. No additional fees are associated for this service.

Additionally, a consultant will be dedicated to the client's account, working each step of the way to ensure that everything works as expected and specified.

**Do sub-vendor relationships result in additional fees?**

Document vendors, credit, flood, and title agencies each typically charge for their services. These contracts and terms are external fees and not regulated by the Path sales contract.

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# Compliance

## General Compliance

### **What are the compliance controls for federal and state rules?**

Compliance is a wholly separate workflow within Path, meaning it has unique statuses that track where each loan is relative to the compliance workflow. Rules governing compliance are not hard coded. But the calculations needed to support compliance changes are hard coded. Path can enforce any compliance rule that clients choose; these rules can act as soft stops, hard stops, or merely warnings. All fields in Path are reportable, including compliance statuses, exceptions, and dates.

Additionally, the rules engine enables the client to create as many rules as desired to control compliance. Path is also integrated with compliance vendors for automated compliance checks at any status of the loan process.

### **How does Path maintain federal, state, and other regulatory updates?**

Path's policy depends on the specific compliance requirement. For example, if a federal change is mandated, Path will incorporate those changes into the system as it is incumbent on us to keep our customers and our system in compliance with all federal regulations. For state, custom rules can be created to handle state-specific compliance at the request of the customer.

### **How are compliance reports handled?**

Path has HMDA, NMLS, and MRC call reports available from the onset. Custom reports can be built upon request.

### **Can Path generate loan conditions/stipulations based on state and federal law, loan type, etc.?**

Yes, users can create conditions that are filtered by state, loan type, loan purpose, lien position, and property type.

### **Is Path able to run compliance testing throughout the loan process?**

Yes.

### **Is Path able to do pre-closing and post-closing audits and reports?**

Yes.

Compliance

### **Can Path generate HMDA reports?**

Yes.

**Is Path able to generate reports that track audit history at the field level (what changed, previous value/current value, who changed it) and highlights changes that triggered out of compliance warnings, tolerance, or violations?**

Yes.

## **Federal Law Compliance**

### **How does Path enable compliance with the Equal Credit Opportunity Act?**

Path has all the necessary screens and forms to comply with ECOA requirements. This data is reportable, and enforcement is at the discretion of clients.

### **How does Path enable compliance with the Fair Housing Act?**

Path has all the necessary screens and forms to comply with FHA requirements. This data is reportable, and enforcement is at the discretion of clients.

### **How does Path enable compliance with the Truth in Lending Act, Real Estate Settlement Procedures Act, and TRID?**

Path complies with the current CFPB TILA/RESPA Integrated Disclosures (TRID) and is integrated with Mortgage Industry Standards Maintenance Organization (MISMO) standards.

### **How does Path enable compliance with the Fair Credit Reporting Act?**

Path has all the necessary screens and forms to comply with FCRA requirements. This data is reportable, and enforcement is at the discretion of clients.

### **How does Path enable compliance with the Privacy of Consumer Financial Information Rule of the Gramm-Leach-Bliley Act?**

Hard stops can be applied to prevent any unauthorized users from creating new applications. Hard stops can be state-specific, license-specific, or proprietary as determined by the client.

## Compliance

### **How does Path enable compliance with Home Mortgage Disclosure Act?**

Hard stops can be applied to prevent any unauthorized users from creating new applications. Hard stops can be state-specific, license-specific, or proprietary as determined by the client.

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# Workflow

## General Workflow

### What is the standard workflow?

The standard workflow is as follows:

- Application/Origination
- Underwriting
- Processing
- Closing

Each step in this workflow is completed by various roles (which themselves are customizable):

- Loan originator
- Processor
- Underwriter
- Document preparer
- Closer/funder
- Shipper

### Are workflows customizable?

Yes, Path provides users with a unique, configurable, and role-based set of functions (that is, origination, processing, underwriting, etc.) that are created at no additional cost to the client. Each user can customize their pipeline view, which provides for total transparency and enhanced communication across internal departments and external messaging to consumers.

### Are exception processing and the workflow queues customizable?

Yes, Path provides fully configurable workflows, customizable exceptions, approvals, hard stops, and training features, which are created at no additional cost to the client.

### Can key inputs and outputs be customized (customized letters, documents, reporting, product types, etc.)?

Yes, Path provides custom forms, custom reporting and all output materials can be branded at no additional cost to the client.

### **What workflow tools are available?**

Path provides and supports all standard mortgage operational tasks and tools, including (but not limited to) the following:

- Credit check
- Flood certification
- Mortgage insurance
- Title
- Appraisal requests
- Data submission
- Document sorting and storage
- eSign
- Product selection
- Lock request
- Lock approval/denial
- Loan approval/denial
- Condition distribution/clearing/waiving
- Change of Circumstance
- Funding, shipping
- Secondary trading
- Delivery
- Quality assurance
- Compliance

### **Are there defined role and user profiles?**

Yes, roles and user profiles are created according to the client's direction, which are then edited and maintained by the client's internal system administrator.

### **Are there built-in controls to prevent operational errors?**

Yes, Path comes with pre-configured hard stops to prevent premature disclosure and compliance errors. Additionally, many role-based rules and procedural workflows are configurable according to client's business requirements.

### **How does Path manage/control workflows and users?**

Path workflows are configurable according to the client's business requirements. The system administrator can fully configure a user's access rights and responsibilities. For example, the administrator controls a user's ability to



## Workflow

originate or underwrite loans and whether a user can access the Compliance screens and the level of access to those screens.

### **How do users know which controls, conditions, and/or rules are restricting workflow or stopping an action from being taken?**

Path has a Submission Summary feature that identifies which loan characteristics are required from the loan officer to move a new file into the processing flow. There are also error messages that tell the user what information is missing and what steps to take to move the process along. Additionally, certain functions and action buttons are only available after the loan progresses to a certain stage.

### **Can Path handle changes in funding requests, such as reversals?**

Yes, Path accommodates the un-funding of loans.

### **Are printing and shipping supported?**

Path has the capability of printing all screens and dashboards, along with sending documents via email. Select document vendors are currently integrated with Path, such as IDS and DocMagic.

### **What withdrawal options are available when an application is terminated?**

Loans can be withdrawn, denied, and cancelled within Path. The terminology and business rules can be configured to mirror the client's credit policy.

### **How does Path handle exceptions to underwriting, pricing, loan amount, etc.?**

Business rules are configurable to mirror the client's credit policy and risk tolerances.

### **Does Path allow product or pricing selection without a valid credit score/report (no SSN, Foreign National, entity borrower)?**

Yes.

## Documents

### **How is document management integrated into the workflow?**

Document management is an integral feature within Path, as documents can be uploaded, sorted, merged, extracted, emailed, edited, printed, and put into document packages.

### **Does Path allow applicants/borrowers to upload requested documents?**

Yes, the Document Request feature in Path is specifically designed to facilitate this. This feature is also integrated with Zip (the Point-of-Sale systems that comes with Path), where documents can be sent to Path via Zip.

### **What vendors are used for standard mortgage documentation?**

DocMagic and IDS.

### **Does Path allow for customized documents?**

Yes, The Custom Form feature in Path is specifically designed to facilitate this.

### **What application and closing documents are provided.**

Path provides the Uniform Residential Loan Application, Closing Disclosure, Loan Estimate forms, among many other forms.

### **Does Path have final loan document preparation capabilities?**

Yes.

### **Can disclosures and agreements from borrowers be printed and downloaded?**

Yes.

## Underwriting

### **How does underwriting work in Path?**

Loan files, which meet the client's criteria for completeness, automatically land in the underwriting queue. Workflows can be configured for client-specific nuance, but typically files are either approved or declined at this juncture, though system decisions can be manually reversed by management when necessary.

## Workflow

### **Does Path have an Automated Underwriting System (AUS)?**

Path offers a custom Automated Underwriting System (AUS), including Desktop Underwriter and Loan Product Advisor, which is configurable to mirror the client's credit policy and risk tolerances.

Custom findings outline the applied program eligibility criteria and relevant documentation requirements.

The underwriter is also able to approve loans on a case-by-case basis. The underwriter can also issue underwriting conditions as needed.

### **Are Desktop Originator and EarlyCheck included in AUS?**

Yes, both Desktop Originator and EarlyCheck are provided by Path's AUS, along with Portfolio Underwriter, FHA Total Scorecard, Loan Product Advisor, etc.

### **Does Path provide any income analysis templates?**

Yes, there are templates for analyzing tax returns and summarizing total borrower income from tax returns, entities, etc.

### **Can credit report information be imported directly into the loan application's liabilities section?**

Yes.

## Funding

### **What funding capabilities does Path have?**

In Path, users can schedule closing, order and send closing docs, calculate wire, request funding, track when closing packages are received, complete the settlement preparations, document and track escrow holdbacks, redraw funds, and unfund a loan if necessary.

### **Are funding requests tracked in Path?**

Yes.

### **Can Path handle changes in funding requests, such as reversals?**

Yes.

## General Product Capabilities

### What type of loan structures can Path handle?

- Co-ops
- Condos
- Investment properties
- HELOCs
- Second, third, and fourth lien loans
- Pledge loans
- Fully amortizing loans
- Interest-only loans
- Balloon loans
- Refinance loans
- Construction loans
- Construction-to-permanent loans
- Renovation-to-permanent loans
- Lot loans

### Can users add custom fields to the screens in Path (for example, adding a Unit Number field to the Loan Transmittal screen)?

Yes, custom fields are supported in Path.

### Can users add custom screen in Path?

Yes, clients can fully customize new screens in Path to display various loan data.

### Are custom fields reportable?

Yes.

### Can Path control a user's screen access based on the roles they have?

Yes, role-based access is fully configurable by the administrator, who determines which areas a role can access in Path and the level to access.

### Can users create test loans from existing loans, to explore different scenarios without changing the original loan?

Yes, loans from Production can be copied to Sandbox, specifically for the purpose of testing out different loan parameters and scenarios.

## General Product Capabilities

### **Can ULAD 3.4 files be imported and exported to Path?**

Yes, Path supports the importing and exporting of ULAD 3.2 and 3.4 files (Fannie and Freddie), as well as FMN 3.2 files.

### **Can loan data be corrected and/or deleted throughout the loan process?**

Yes, Path gives clients complete control over their loan data.

### **Does Path allow information to be separately gathered from borrowers and coborrowers?**

Yes, eSign and document requests can be separately sent to borrowers and coborrowers.

### **Does Path provide a dashboard with key loan data?**

Yes, users can customize as many dashboards as desired as well as the loan data displayed in dashboards. Dashboards are hidden or displayed with one click.

### **Does Path allow for alternate mailing address flexibility (including foreign mailing addresses)?**

Yes.

### **Does Path permit lending to entities (LLC, LLP, trust, other, etc.) in a vesting as well as borrower capacity?**

Yes.

### **Does Path allow for TIN tracking in lieu of SSN for entity lending scenarios?**

Yes.

### **Does Path allow lending to international clients (non-US mailing addresses, no SSN, etc.)?**

Yes.

### **Can notes and comments be added to a loan file?**

Yes.

## Product and Pricing

### **What product structures does Path support?**

Path employs a fully customizable Product and Pricing Engine (PPE) which affords personalization and branding of unique loan products, credit policy decisions, and maximum control of your credit risk profile and documentation of fair lending validation. Custom programs and terms are supported.

### **How are new products created?**

New products can be added to the Pricing Engine, including eligibility criteria, LLPA's, and base rate sheet mapping, etc.

### **How does Path set/update pricing?**

Once a loan product's base rates are mapped, the client can upload the latest base rates into the Pricing Engine as frequently or infrequently as desired

### **How are payments and qualifying payments calculated?**

Path's Automated Underwriting System (AUS) findings will reflect the qualifying payment and qualifying ratios, as defined by the client's custom loan program. Path will reflect the payment as required by compliance/disclosures.

### **Is there flexibility in Path to program new products?**

Yes, each loan program is custom-tailored to the client's specifications, including eligibility, pricing, and underwriting findings.

### **How does Path handle changes to product and point options within a given rate lock period?**

Path allows clients to request new or revised lock options, and the option of accepting or declining such requests with corresponding pricing adjustments, which the system implements. Market fluctuations during any given period are tracked and made known to Path users via pricing returned from the Custom Pricer.

### **Can Path accommodate multiple caps for rate ceiling?**

Yes, all ARM parameters are part of the custom loan product definition and may be adjusted over time as needed.

**For loans in floating status, does Path automatically update the loan record or alert users to pricing changes?**

Yes, business rules regarding floating rate status, as well as alerts sent to specific users, are configurable. Path records all loan statuses via dashboard settings, hence changes to rate and lock data are obvious and can be sorted for specific tracking.

**Are there any LTV limitations in Path?**

No, all eligibility criteria can be custom-tailored in the loan product definition. Allowable exceptions or compensating factors can also be noted in the Automated Underwriting System (AUS) findings if desired.

**Can Path cross reference requested programs against program guidelines?**

Yes, the Pricing Engine checks the loan against basic product eligibility, and the Automated Underwriting System (AUS) can validate any aspect of the URLA form or credit report as needed.

**Does Path allow for off-sheet pricing adjustments?**

Yes, users can add, modify, and remove price adjustments at the time of lock confirmation and has final decision over pricing controls.

**Does Path allow for the pledge of assets in lieu of a traditional down payment as well as calculate an Effective Loan to Value (ELTV)?**

Yes, in Automated Underwriting System (AUS) findings, LTV can be customized to consider assets in lieu of down payment.

**What rate lock duration options are available?**

The Pricing Engine can return any lock period, including the nearest non-standard duration.

**Can users see historical pricing from day of lock, worst case, and current pricing?**

Yes.

**Does Path show the best offered pricing across all investors?**

Yes.

## Product and Pricing

**Can Path calculate financing terms, by loan term, loan payment, and/or loan amount?**

Yes.

**Can Path handle qualifying rates based on the higher of the note rate or the fully indexed qualifying rate?**

Yes.

**Can Path handle a pre-determined buy-up and buy-down schedule for each product?**

Yes.

**Can the Pricing Engine handle multiple pricing adjustment variables (including loan purpose, occupancy, state, LTV, loan amount, and credit score)?**

Yes.

**Are there any loan amount limitations in Path?**

No.

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# System

## Data Management

### **Where is the data stored?**

All client data is stored on Path's internal data facility. For backup, Path uses Microsoft's Azure, located in southwestern US, approximately 500 miles away from the primary data facility.

### **Are sensitive data encrypted during transmission?**

Yes, data is encrypted in transit using AES 128-bit encryption for communications.

### **Is data separated from other clients' data?**

Yes, data is logically separated on storage servers.

### **How is the principle of least privilege applied and what is the user's role?**

Unique users are associated with roles. Role-based access and controls promote segregation of duties into job-specific tasks. Permissions can be defined per role and are editable by authorized system administrators only.

### **Are separate environments maintained for development, testing and production?**

Yes, test, staging, and production databases are all separated, and access controlled.

### **Does Path have redundant infrastructure (for example, servers and networks) to ensure minimal impact client data in the event of an outage?**

Yes.

### **Does Path have bulk data download capabilities (Excel, text files, etc.)?**

Yes.

## Authentication

### **What authentication model is used?**

Path uses the username and password model, with high password complexity.

### **Does Path prohibit the use of shared user IDs?**

Yes, user IDs cannot be shared, but one user can have multiple roles such as admin, superuser, regular users, etc.

### **Does Path audit trail the user ID and date/time when data is exported?**

Yes.

### **Are simultaneous logins with the same user ID prevented?**

Yes.

## Access

### **Will the client's employees/staff be granted access to Path?**

Yes, the client's administrator can grant access (including the level of access) to anyone within the organization.

### **Will access be managed (account administration) by the client?**

Yes, the client's administrator can configure the access level and responsibilities of all roles and users.

### **How does Path assign access?**

Each user will be assigned at least one role, which is allowed access to certain areas/screens, given how the role is configured.

### **Is Path able to exclude certain IP addresses?**

Yes, Path has an IP whitelist/blacklist feature, specifically designed to facilitate this.

System

## Security Testing

**Does Path perform penetration tests on its externally facing network?**

Yes, vulnerability scans are performed quarterly.

**Is the source code reviewed?**

Yes, periodic manual source code reviews are performed. All development efforts are in-house.

## Production Monitoring

**Are system uptime and performance metrics available?**

Yes, system uptime and performance reports can be made available upon request. Typically, reports are run quarterly. However, if needed more frequently, these reports can be produced upon request.

**Is the production environment monitored for outages, failures, performance thresholds?**

Yes.

**Does Path test the throughput and capacity via load/stress testing?**

Yes.

## Input Validation

**Does Path ensure that client data is not being altered by external sources?**

Yes, clients always have physical control over their proprietary data. Path can only access client data by prior written consent.

**Does Path perform input validation to ensure data integrity as well as protect against security vulnerabilities?**

Yes.

## Session Management

### **How does Path handle session management?**

Path uses large session IDs, which are cryptographically secure and randomly generated. Session timeouts are no more than 24 hours. Upon logout, session specific information is destroyed.

## Software Update Management

### **How are software updates and releases handled?**

Path follows a software development life cycle that includes major phases of project planning, design, development, quality assurance, staging, and release to production.

Changes must be documented, prioritized, tested, and management approved before being scheduled into the release cycle.

### **Are all updates and changes tested prior to implementation?**

Yes, all updates and changes, including new features and enhancements, are tested by the product management and quality assurance teams.

### **Is there a staging environment where users can test updates and new features before they are implemented in production?**

Yes, clients have their own staging environments, specifically for this purpose.

### **Are program, configuration, and scheduling changes approved by management prior to implementation?**

Yes, all changes are documented, prioritized, tested, and approved by management before being implemented in the scheduled release cycle.

## Architecture

### **What tech stack does Path use (software products, programming languages, etc.)?**

Microsoft Visual Studio, C#, HTML, JavaScript, and SQL.

## Integration

Full list of Path's vendors and partners can be viewed here: [Integration List](#).

System

**What Point-of-Sale (POS) system is integrated with Path?**

Zip is the POS system (by Calyx) that comes with Path. Loan applications can be created in Zip and sent to Path for processing, underwriting, closing, etc.

**Can documents be collected from Zip and sent to Path?**

Yes, users can request and collect documents from Path through Zip.

**What third-party document vendors are integrated with Path?**

Path is integrated with IDS and DocMagic.

**Can data from third parties be automatically populated?**

Path's third party vendor interfaces are all designed to auto-populate loan data into Path upon ordering a service. Additionally, the documents associated with these services will automatically be uploaded into Path's document storage upon ordering the service.

**Does Path capture the date/time when orders are placed with vendors?**

Yes.

**Is Path integrated with Uniform Collateral Data Portal (UCDP) for appraisal submission to Fannie or Freddie?**

Yes.

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# Security

## Information Security

### **Are information security policies and procedures documented?**

Yes, Path information security policies are reviewed annually and updated as needed. The policies are approved by senior management, communicated to staff, reviewed annually, and made available for reference and application.

### **Are critical vulnerabilities (internet facing servers and applications) patched within 4 weeks of the patch becoming available?**

Yes, applications are patched based on severity, testing of the patch, and approval by management, before the application fix is released to production.

### **Does Path encrypt all client data over insecure networks (including any initial data loads at the start of a contract)?**

Yes, encryption in transit is the mandatory policy are Path.

### **Is client data prevented from being used in non-production environments and systems, unless obfuscated or scrambled?**

Yes.

### **Is there a defined computer incident/data breach policy in place?**

Yes.

### **Is there spyware protection installed on all servers and workstations?**

Yes.

### **Are unauthorized network connection points (wireless access points, modems, etc.) monitored?**

Yes.

### **Does Path deploy a Network Intrusion Detection System (NIDS) on internet facing systems?**

Yes.

## Security

**Is there a Data Lifecycle Management (DLM) process, to handle the secure disposal of electronic storage media (hard drives, optical media, etc.) and hard copy data (pulping and shredding)?**

Yes.

## Staffing Security

**Does Path have non-disclosure agreements with staff (employees and contractors)?**

Yes, employees, subcontractors, and temporary workers with access to client data are bound by non-disclosure agreements.

**Are background checks conducted on employees?**

Yes, Path conducts background checks for all employees, consultants, temporary workers, and external providers. Background checks include criminal and credit checks, employment history, and motor vehicle. Contractors receive background screening through their agency.

**Is there a mandatory information security and privacy training program?**

Yes, Path requires all staff to complete the program, which is regularly reviewed for appropriateness.

**Are administrative entitlements to production applications, databases, and operating systems restricted to personnel who need such access for operational purposes?**

Yes, quarterly access reviews are performed.

**Does Path prevent access to removable media (floppy drives, writeable CDs and DVDs, USB storage devices, etc.)?**

Yes, only company-managed devices are allowed on the production network.

**Are remote users prevented from copying client data to personal devices when using remote connectivity (e.g., access via VPN, external web access, Outlook, etc.)?**

Yes, for all staff who use personal devices for work (phones, tablets, etc.), they are required to install and use the Company Portal app (by Microsoft) to ensure no work-related data is copied to personal devices.

Security

**Does Path require 2-factor authentication for remote connectivity?**

Yes.

**Does video surveillance cover entry and exit points to office facilities and data centers?**

Yes.

**Does Path review the security posture of subcontractors that are given access to client data and ensure resolution of security issues that have been identified?**

Yes.

**Does Path designate a person to oversee the information security program?**

Yes.

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# Business Continuity

## Business Continuity Plan (BCP)

### **What is Path's BCP?**

The Path IT team manages the BCP, with out-of-region recovery strategies, where applications and business functions are transferred to alternate locations for continuation of normal operations, to ensure the recoverability of services in the event of a disruption. BCP tests are done for all Path clients.

### **How often are BCP tests conducted and recorded?**

BCP tests are conducted at least annually, and the results are documented.

### **How often is the BCP reviewed by senior management?**

Annually.

### **What does the BCP include?**

- Crisis management protocols
- Staff relocation plans
- Recovery teams with defined tasks
- Critical third parties
- Escalation and notification procedures to clients

### **What potential scenarios have been considered?**

- Natural disasters
- Pandemics
- Regional disruptions
- Service provider failures
- Short-term and long-term building disruptions

## Recovery and Backup

### **How often are business recovery tests with vendors performed?**

Annually.

## Business Continuity

**What recovery time is the BCP capable of delivering services to clients.**

24 hours.

**What hot-site operation is used for business-critical systems?**

Site-to-site disk mirroring.

**What is the backup maintenance policy?**

Path's policy requires data to be stored off-site in a secure, environmentally controlled facility.

**How does Path ensure recovery objectives are met?**

Backup media are periodically restored and routinely tested to ensure recovery objectives are met as expected.

**Does Path have a backup data center/facility?**

Yes, backup is provided by Microsoft Azure, in southwestern US, approximately 500 miles away from the primary data center.

**What are the backup procedures (including encryption and restoration testing frequency)?**

SQL point-in-time backup is retained for 14 days. AES 256-bit encryption is used. Restoration testing is done annually.

**Does the backup facility use power, water and transportation arrangements that are different from those used at the primary data center/facility?**

Yes.

**Does Path have exclusive use of its recovery services?**

Yes.

**Has Path tested its system and recovery plans with key third parties /vendors?**

Yes.

**Does Path have arrangements for personnel recovery, including alternative working locations and remote working?**

Yes.

Business Continuity

**Does Path have a risk/resilience assessment program for vendors?**

Yes.

## Remote Access

**Does Path support remote access environments?**

Yes.

**What is the maximum capacity of personnel supported by the Path's remote access environment?**

Up to 100% can be supported.

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