



Security and Privacy Overview

Information Services

Version 1.19



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Audience

This document has been written for the current or potential clientele of Concur Business Services. The client may be running a variety of services or products within the Information Services data center(s), including Concur Travel & Expense, Concur Expense, Concur Cliqbook Travel, Concur Invoice, Concur Imaging, Concur Analysis, Concur Reporting, or re-branded versions of Concur product lines.

This document assumes knowledge of basic and best business security practices, and is an overview of Concur's comprehensive Security Services. If at any time a client or potential client requires additional information, a meeting will be arranged with Concur Security and Compliance. All information and identified brand name solutions are subject to change or update, and should be considered a point-in-time reference. Contact Concur Security and Compliance for the latest version of this document.

Author

This document has been prepared and authorized by Concur Technologies Security and Compliance Group.

Additional information is available upon request from Concur's Security and Compliance Group.

Introduction

Concur is the world's leading provider of automated on-demand Employee Spend Management business services. This document provides a security overview of Concur's Business Services model. There are five levels of security that are discussed in this document:

- Organizational Security
- Privacy
- Physical Security
- Logical Security – network, host, and application
- Development
- Resiliency

Security and Compliance

Concur has a dedicated Security and Compliance group. This group has been chartered according to ISO 27001 (formerly ISO 17799, BS 7799 Part II) ISMS standards. This group is led by the Manager of Information Security and Risk Management, who reports to the Sr. Director of Governance Services. Security and Compliance also has a Data Security Analyst on its staff.

“The ISMS is designed to ensure the selection of adequate and proportionate security controls that protect information assets and give confidence to interested parties.”
-ISO27001:2005

Security and Compliance coordinates Concur's ISMS and provides for:

- Integrity,
- Risk Acceptance,
- Risk Analysis and Assessment,
- Risk Evaluation,
- Risk Management and Treatment, and
- Statements of Applicability.

Security and Compliance Responsibilities

Concur's Security and Compliance Group has a broad range of responsibilities, including:

- **Security and Risk Management**
 - Quarterly executive security steering committee meetings
 - Risk assessments and risk analysis
 - Compliance to applicable laws and regulations
 - Internal audit of applicable systems and processes
- **Business Controls and Audit Compliance**
 - Development, management, and internal audit of IT controls for Sarbanes Oxley, ISO27001:2005, SAS70, and PCI DSS (Payment Card Industry Data Security Standard)
 - Sarbanes-Oxley General Computing Controls (GCC) and Entity Level Controls audits
 - SAS-70 Type II data center compliance audit

- SAS-70 Type II audit of Concur online services
- ISO 27001:2005, formerly BS7799 Part II ISMS (Information Security Management System)
- ISO 20000:2005 (IT Service Management)
- PCI DSS (Payment Card Industry Data Security Standard)
- FISAP (Financial Institution Shared Assessments Program)

- **Access Management**
 - Privileged access approvals
 - VPN Access Control List approvals

- **Privacy**
 - Compliance with privacy laws and directives in the U.S., Canada, EU, and other jurisdictions

- **Incident Management**
 - Development, testing, and training for security incident response
 - Management of security incidents
 - Development of proactive incident avoidance controls
 - Escalation support for 24/7/365 IDS (Intrusion Detection Systems)

- **Vulnerability Management**
 - Scanning of application code as part of the software QA cycle
 - Perimeter vulnerability penetration scanning
 - Infrastructure vulnerability scanning
 - Structured remediation process

- **Corporate Business Continuity and Disaster Recovery Planning**
 - Development and testing of Concur's Disaster Recovery plan
 - Development and testing of Concur's Executive Disaster Response plan

- **Environment and Product Architecture**
 - Security and intrusion architecture validation
 - Security and risk mitigation of architecture proposals
 - Audit and detection system inclusion into proposals

- **Corporate Publishing and Contracts**
 - Corporate Information Security Policy
 - Corporate Information Security Awareness
 - DRP, BCP, Backup Processes
 - Security and Risk Policies/Standards
 - Review of Legal Agreements

Concur models the security posture of its technical operations by adopting, following, or seeking guidance from the following entities, standards, and frameworks:

- ISACA/ITGI/COBIT (Information Systems Audit and Control Association / IT Governance Institute / Control Objectives for Information and related Technology)

- COSO (Committee of Sponsoring Organizations of the Treadway Commission)
- FISAP (Financial Institution Shared Assessments Program)
- Privacy Legislation
 - GLBA (Gramm-Leach-Bliley Act – U.S. financial institution regulation)
 - SB1386 (California State PII regulation)
 - SB6043 (Washington State PII regulation)
 - EU Directive 95/46/EC (known as Safe Harbor in the U.S.)
 - PIPEDA (Personal Information Protection and Electronic Documents Act - Canada)
 - Data Protection Act of 1998 (UK)
- US-CERT (U.S. Computer Emergency Response Team, the operational arm of the National Cyber Security Division (NCSA) at the Department of Homeland Security (DHS))
- U.S. Internal Revenue Service Revenue Procedure 97-22
- NIST (U.S. National Institute for Standards and Technology)
- OWASP (Open Web Applications Security Project)
- SANS Institute
- InfraGard

Business Controls

Concur has developed a comprehensive set of business controls that ensure the integrity and availability of Concur online services. These controls were developed to bring Concur into alignment with the following standards, regulations, and / or certifications:

- ISO 20000 (the ISO version of ITIL, the IT Infrastructure Library)
- ISO 27001:2005 (formerly known as BS 7799)
- Sarbanes-Oxley General Computing Controls and Entity Level Controls
- SAS70 Type II
- PCI DSS (Payment Card Industry Data Security Standard)

ISO 20000

Concur is certified to ISO20000, the Code of Practice for Information Technology Service Management. This well-recognized standard provides a framework for the following business processes:

- Incident Management
- Problem Management
- Change Management
- Release management
- Configuration Management
- Service Level Management
- Cost Management
- Availability Management
- Capacity Management
- IT Service Continuity Management



ISO27001:2005
ISO20000:2005
IS 84383

Concur was initially certified to ISO 20000 in 2008 and undergoes twice-annual audits.

ISO 27001:2005

Concur is certified to ISO27001:2005, the successor to BS 7799, the Code of Practice for Information Security Management. Concur first became BS7799 certified in 2004, and undergoes annual audits for renewal of this certification. Concur was the 18th U.S. company to become ISO27001 certified. In order to earn this certification, Concur is required to show compliance in the following areas:

- Security Policy
- Organizational Security
- Asset Classification and Control
- Personnel Security
- Physical and Environmental Security
- Communications and Operations Management
- Access Control
- Systems Development and Maintenance
- Business Continuity Management
- Compliance



ISO27001:2005
ISO20000:2005
IS 84383

Concur is in its fifth year of BS7799/ISO27001 audits, which take place twice each year.

Sarbanes Oxley

As a public company, Concur is required to comply with U.S. Sarbanes Oxley Act of 2002 to ensure the integrity of its financial reporting and operations. Concur has adopted the control objective framework developed by Concur's public auditor of record. This framework consists of controls governing operations in the following functional areas:

- Access Management
- Change Management
- Governance
- Operations

Concur is audited once per year for Sarbanes Oxley compliance as part of its annual public audit.

Similar control objectives are asserted across a significant portion of U.S. public companies.

SAS70 Type II

In order to meet the needs of its clients, Concur has established a control environment that ensures the integrity and security of Concur services. The controls are audited twice per year by Grant Thornton LLP, an American Institute of Certified Public Accountants (AICPA) licensed firm. The control objectives include:

- Security policies, procedures, and awareness
- Operational policies and procedures
- Change control process and procedures
- Physical security and access controls
- Vulnerability management
- Employee recruiting and hiring
- Protection of transmitted information
- Logical access control

- Concur Expense Service software and services
- Software development life cycle
- Performance and capacity management
- Security of offline data storage media

Concur's SAS70 Type II audits take place twice each year, from January through June and from July through December.

In addition to the Concur SAS70 described above, Concur U.S.-based data centers for Concur Expense, Concur Expense Pro, Concur Cliqbook Travel, and Concur Travel & Expense have a separate SAS70 Type II audit. Control objectives for these data centers are:

- Physical access
- Operations monitoring and problem management
- Change management
- Emergency change management
- Logical access security
- Backup
- Environmental controls
- Organization and administration

Finally, Concur Audit has a separate SAS70 Type II audit. Control objectives for Concur Audit are:

- Organization and Administration
- Expense Report Auditing Services
- Expense Report Data Entry
- Client System Administration Services
- Claims Processing for Leases
- Claims Payment Services
- Claims and Expense Report Customer Care
- Logical Security
- Change Management
- Segregation of Duties
- Physical Security
- Contingency Planning

Payment Card Industry Data Security Standard (PCI DSS)

Concur is a VISA CISP (PCI) Compliant Service Provider, subject to an annual assessment and quarterly security scans. The high-level requirements in PCI are:

- Install and maintain a firewall configuration to protect data
- Do not use vendor-supplied defaults for system passwords and other security parameters
- Protect stored data
- Encrypt transmission of cardholder data and sensitive information across public networks
- Use and regularly update anti-virus software
- Develop and maintain secure systems and applications
- Restrict access to data by business need-to-know

- Assign a unique ID to each person with computer access
- Restrict physical access to cardholder data
- Track and monitor all access to network resources and cardholder data
- Regularly test security systems and processes
- Maintain a policy that addresses information security

Concur undertakes an annual PCI external audit that is performed by one of VISA's approved assessors.

Privacy

Concur collects only the minimum necessary PII (personally identifiable information) and uses it only for agreed upon purposes. Concur has enacted the following safeguards related to PII:

- Encrypted when transmitted over public networks
- Encrypted when stored in databases and flat files
- Accessible only by vetted, authorized personnel
- Storage of PII prohibited on Concur workstations
- Published privacy policies

Concur complies with the following privacy laws:

- EU Privacy Directive 95/46/EC
- U.K. Data Protection Act of 1998
- Canada PIPEDA (Personal Information Protection and Electronic Documents Act)
- U.S. state PII privacy and incident disclosure laws

Physical Security

Concur takes steps to ensure the availability and physical protection of its servers by carefully screening personnel, and by controlling personnel access to server environments. Audits that cover physical security include:

- ✓ ISO 27001:2005
- ✓ Sarbanes-Oxley
- ✓ SAS-70
- ✓ PCI DSS

Personnel

Concur performs verification of employment, references, criminal, education, credit, and U.S. Treasury OFAC background checks on all employees (details and methods on background checks for Concur employees within and outside of the U.S. vary based upon local laws). New employees are given training on company policies and procedures, including standards for corporate ethics and business conduct, a confidentiality notification, and a signed NDA (non-disclosure agreement). All new employees receive security awareness training as a part of New Employee Orientation (NEO), and are required to sign an acknowledgment of understanding of Concur's corporate information security policy. Performance appraisals are completed periodically to ensure that employees' knowledge remains current and they are aware of both new and updated policies and procedures. In

addition, the importance of security to Concur is evident through the presence of physical and other security controls (e.g., personnel and visitors must pass through several levels of security to gain access to Concur's Information Services facilities).

Facilities

Access to the Information Services data centers and internal Concur Operations Center is controlled with electronic security badges using proximity key cards. Only specifically authorized personnel are granted access to the server rooms. The electronic security badge system maintains an audit trail of all admissions to these facilities. In order to gain admittance, customers, contractors, and other visitors must be escorted by authorized personnel.

Concur outsources data center services for Concur Expense, Concur Expense Pro, Concur Cliqbook Travel, and Concur Travel & Expense to a third-party hosting facility. This contains Concur product line web servers and other infrastructure equipment. Concur relies on physical security in place at this facility. All United States data centers undergo twice-annual SAS70 Type II audits. To gain assurance that these controls are maintained, Concur obtains a service auditor report on a semiannual basis. This report is available for client inspection through a separate NDA that is available upon request.

Concur ExpenseLink and Concur Pay are hosted in Concur's Minnesota data center. This facility is protected with recording video surveillance, key card+PIN physical access control, redundant fiber optic network connectivity, UPS, and backup generator.

Logical Security

Network Security

Concur's Information Services network architecture ensures that sensitive client data is protected through best business practice security policies and procedures. These procedures are derived from ISO 27001 and 27002, PCI DSS, SAS 70, and other standards. Network security encompasses needs-based access, proper network segmentation, and Security and Compliance oversight.

Audits that cover network security and integrity include:

- ✓ ISO 27001:2005
- ✓ Sarbanes-Oxley
- ✓ SAS-70
- ✓ PCI DSS

Network security highlights include:

- **Secure Internal Administration Network:** Concur employs a complete internal infrastructure to backup and monitor servers through secure connections. All web servers contain two Network Interface Cards (NICs). One NIC is connected to the public Internet behind the firewall, and the other is connected to the Concur Operations internal private network. The IP addresses of these servers are protected from third parties through Concur's non-routable network.
- **Hardened Router Configurations:** Router configurations are used to correctly route packets to their proper destinations, and to restrict traffic. Access Control Lists (ACLs) on the

front-end routers are used to stop common attacks that could affect the environment, including IP spoofing and limited denial-of-service attacks.

- **Network Segmentation:** Concur’s multi-segmented network architecture prevents direct public contact or connection to Concur’s private network segment. This ensures client information is not accessible directly from the Internet. Concur utilizes intrusion detection systems that monitor all TCP/IP incoming and outgoing traffic between network segments.
- **Proactive Monitoring:** Security and Compliance continuously monitors industry communities for news of security alerts, as well as vendor and partner security changes that may affect Information Services and Concur’s product line. Information Services has 24/7 automated monitoring with backup personnel. Security threats are thoroughly investigated. Procedures exist for immediate steps to resolution and containment of security incidents.
- **Intrusion Detection Systems:** Intrusion Detection System (IDS) technology is an integral component of Concur’s comprehensive enterprise security strategy. The IDS alerts Concur of suspicious IP traffic or log activity that occurs on Concur’s systems and networks. Where possible, isolated IDS servers bear the security audit load, reducing overall consumption of resources within the application servers to zero levels.
- **Active Vulnerability Assessment:** Security and Compliance performs infrastructure security scans on a regular basis using a VISA approved PCI scanning vendor. Scans are performed from the Internet as well as from internal scanning appliances. Concur also scans its online application software for vulnerabilities. Any vulnerability found is managed through a remediation process, where this occurs, and dependant on the nature of the vulnerability a re-scan is required prior to implementation into production.
- **Application Firewalls:** Front-end firewalls protect applications and data by validating information flowing in and out of Information Services through an Access Control List. The Firewall and proxy application inspects data and records its origin before being accepted into the network. The Firewall denies all connections except those specifically allowed. The firewall also protects the network from random “ping sweeps” and unauthorized users by hiding or blocking unused network ports. Security violation attempts are logged, monitored and escalated when discovered by Concur Operations.
- **Database Firewalls:** Concur utilizes a second layer of firewalls that protect client databases. These firewalls permit database queries only from Concur application servers.
- **VPN:** Concur Operations personnel use a best-in-class VPN when connecting and transmitting from outside the trusted network. The VPN secure tunnel offers internal Operations personnel highly secure remote connectivity to perform after-hours maintenance or troubleshooting.
- **Digital Certificates and SSL:** Concur’s services utilize web server digital certificates to verify the authenticity of all client sites. Digital certificates are used to encrypt all Internet web traffic between clients and servers with 128-bit or stronger key length. Concur uses Geotrust as the Certificate Authority for this process. Concur Expense solutions utilize secure sockets layer (SSL) technology to ensure that HTTP communication between Concur clients and Concur servers is encrypted. Through SSL protected HTTP transactions, sensitive information such as financial and personal information passing through the Internet is reasonably protected.

Host-Based Security

Concur online services provide high levels of security through a specialized server build process. Information Services employs a hardened, approved, and standardized build for every type of server used

within the infrastructure. This procedure disables unnecessary default user IDs, closes down unnecessary or potentially dangerous services, and removes processes that are not required. In addition, all available and approved security patches are installed. Concur utilizes dedicated engineers responsible for continually updating, optimizing, and securing the standard build procedures.

Audits that cover server security and integrity include:

- ✓ ISO 27001:2005
- ✓ Sarbanes-Oxley
- ✓ SAS-70
- ✓ PCI DSS

Host security highlights include:

- **Database SAN (Storage Area Network) Cluster:** Concur Expense databases are stored on a fully redundant SAN. Drives are configured with RAID for all tiers of storage and each segment of data has at a minimum two Standby Drives that will be used automatically in the event of a drive failure. The RAID types vary with each tier of storage; types in use include RAID10, RAID6 and RAID5. Database Servers use N+1 clustering to prevent downtime in the event of a Server failure. The fiber channel connection to the SAN can handle 4GB/sec of bandwidth.
- **Standard server builds.** Windows and UNIX builds are based upon well-known server hardening standards. The latest software and security patches are regularly applied to the standard builds. Security methodology includes locking down and/or disabling / removing appropriate files and services. Security features include encryption services through SSL and password authentication, combined with rapid notification and response to security threats. All modules (software, firmware and hardware) and processes are routinely audited and updated to further mitigate security risk. Server configurations are managed through an enterprise configuration management tool that further ensures server security and integrity.
- **Data Backup.** Backup media for Concur's online services are fully encrypted with AES-128. Media that is stored offsite is safely transported by secure courier to a hardened off-site media storage facility.
- **Alert monitoring.** Security and Compliance monitors vendor security updates, hacker sites, and security industry sites to understand where the next vulnerability and threat will surface.
- **Standard patch process.** All patch fixes are tested through a standard 3-step process to ensure proper functioning within the operating environment before they are applied to the servers.
 1. Patch is applied to a mirror site of affected environment
 2. Patch is migrated to a demonstration site to monitor real-world performance
 3. Patch is applied to production
- **Standard change control process.** All changes to any part of Concur's infrastructure must pass a strict Change Control Process to ensure best practices and minimal service interruption for our clients. Every effort is taken to ensure that all client sites are safe for critical e-business processing.

Application Security

Audits that cover application security and integrity include:

- ✓ ISO 27001:2005
- ✓ Sarbanes-Oxley
- ✓ SAS-70
- ✓ PCI DSS

The Internet service models of Concur online services are delivered to clients via a Software as a Service (SaaS) model. Concur has specified browser settings to enhance Internet speed and performance of the application. Concur uses a combination of technologies, including HTML and JavaScript.

The Concur online services facilitate enforcement of individual client corporate travel policies by allowing custom definitions of:

- Rules for each travel policy, such as approval hierarchies, authorized vendors, and spending limits;
- Actions to take in the event of policy violations;
- Exceptions that merit overriding the approval workflow;
- Role-based security within the application.

Concur authorizes and creates administrator rights for the client organization, which is responsible for additional rights granted to personnel using the system.

Concur Single-Sign On

Concur Expense offers SAML-based single-sign on, which permits client organizations to extend their SSO environment to include Concur Expense. Concur Cliqbook Travel and Concur Travel & Expense offer HMAC-based single-sign on. Single sign-on enables client organizations to have a higher degree of control over user management and authentication policy than would otherwise be available.

Concur Expense Pro Download Server

This download server maintains general ledger data that is extracted from each Concur Expense Pro client database for accounting and reporting. This server contains downloadable reports that are provided to clients through a secured HTTPS site. These reports are designed to integrate with each client's accounting system. Concur Expense Pro client information is stored on a secure file server in an archive directory. Individual information is available for up to 7 years.

Concur Expense FTP Site

Concur Expense and Concur Travel & Expense customers utilize FTP for the transferal and retrieval of client information. The FTP sessions require client-specific accounts and complex, often-changed passwords. Each file is PGP encrypted with client-specific keys, and each file set resides in client-specific directories. FTP directories are chrooted, and have extremely limited function calls. Supported transfer protocols include FTP, SFTP, and FTPS. All processes are logged whether successful or not. Files contain validation tables and customer information to be imported into the Concur Expense application, or general ledger data extracted from the application for client use. Files available for download by the customer must

be deleted at completion of the download process. All files transmitted and received are stored and available for up to 7 years.

Software Development Life Cycle

Audits that cover application security and integrity include:

- ✓ ISO 27001:2005
- ✓ Sarbanes-Oxley
- ✓ SAS-70
- ✓ PCI DSS

Concur utilizes a software development life cycle (SDLC) process to manage the integrity and reliability of its products and services. Elements of the life cycle include:

- Inception
- Requirements and specifications
- Design
- Coding
- Testing
- Scanning for software vulnerabilities
- Release to production

Each step is subject to a formal review and release to the next step in the life cycle. Key security activities that occur in the SDLC include:

- Risk analysis of all new features and changes
- Vulnerability scanning of new software releases
- Change Control Board review prior to release into production

Service Resilience

Concur's services are designed with resilience and availability in mind. The services infrastructure utilizes load balancing, redundant network, server and storage components, and recoverability. A disaster recovery plan ensures that Concur's hosted services are recoverable in the unlikely event that a disaster occurs.

Concur's services are housed in state-of-the-art data centers in Washington State, Texas, and Minnesota. Audits that cover service resilience include:

- ✓ ISO 27001:2005
- ✓ SAS-70
- ✓ PCI DSS

Concur has developed and tested a disaster recovery capability for Concur Expense and Concur Cliqbook Travel that became available in 2007. Additional details are available upon request.

Disaster Recovery and Prevention / Redundancy

Disaster Recovery Testing

Concur's flagship services (Concur Travel & Expense, Concur Expense, and Concur Cliqbook Travel) have formal disaster recovery plans that are tested annually. Additional information, including RTO (Recovery Time Objective) and RPO (Recovery Point Objective) targets and test results, are available upon request.

Client Data Centers

Concur data centers have an uninterruptible power supply (UPS) and backup generators to support the facility in case of a power outage. UPS systems are designed to support all equipment until diesel generators are activated. Data center physical risk mitigation is covered under the data center provider's SAS 70 Type II audit. Data center component and connectivity is covered by Concur.

Concur has designed a minimum of N+1 physical redundancy for the Concur application servers. All servers are backed up on a daily basis. Backup media is taken offsite and stored with a third party, secured media storage vendor. Servers have mirrored disk drives and Concur holds spares onsite in case of drive failure. The SAN database and file servers have redundant arrays of independent disks (RAID) fault tolerance for increased reliability and performance.

Redundancy is maintained for routers, switches, firewalls, load balancers, application and database servers. On fail-over the redundant device is configured to take over immediately. Logs are reviewed and trends are analyzed to identify the potential impact on system availability objectives. Concur has consistently exceeded the standard SLA for uptime for both services, as defined in client service level agreements.

Network Operations Center

The Concur Network Operations Center (NOC) is located in Dallas, Texas. Operations centers also exist within each of the data centers in the event of a central operations failure. The Dallas Network Operations Center has a UPS with a minimum one hour run time, backed up by a generator. Hardened remote VPN circuits ensure that a total loss of the NOC will not affect employee connectivity to the data centers.

Concur Customer Audits

Concur does not support customers, or their auditors, performing audits of any Concur service. Instead, Concur undergoes several external audits that are performed by competent and qualified external audit firms, as described earlier in this document. The written results of many of these audits are available upon request.

Concur does not support any form of security scanning or penetration scanning of any Concur service. Concur does not have separate infrastructure available for such activities; scanning of production environments is prohibited because of the risk of service disruption to other customers. Instead, Concur undergoes periodic external scans, some of which are available upon request.

Financial Industry Shared Assessments Program (FISAP)

BITS is a not-for-profit, CEO-driven financial service industry consortium made up of 100 of the largest financial institutions in the US. One of the products is the Financial Industry Shared Assessments Program (FISAP), which consists of a standard-form, highly detailed questionnaire that suppliers can use when bidding for financially related services. Concur utilizes this questionnaire, which contains more than 3,000 individual questions about the security of Concur services. In many cases, this questionnaire will contain



most or all of the detailed information that customers require regarding Concur service security. Because the questionnaire is already completed, Concur can deliver this immediately, resulting in a substantial time savings during the procurement cycle.

Summary

Concur Technologies, Inc. protects its hosted services using a defense in depth strategy that includes business controls in the following areas:

- ✓ Organizational – well defined roles and responsibilities for security, development, and support processes
- ✓ Privacy – protection and handling of sensitive information
- ✓ Physical – personnel and facilities
- ✓ Logical – network, host, database, and application
- ✓ Development – life cycle processes
- ✓ Resiliency – disaster recovery and continuous monitoring

To ensure that Concur is doing the best possible job in all of these areas, Concur is regularly audited in these functional areas against the following standards and / or regulations:

- ✓ ISO 27001:2005
- ✓ ISO 20000:2005
- ✓ Sarbanes-Oxley
- ✓ SAS-70
- ✓ PCI DSS

Concur makes every effort to protect client data and the client's hosted experience.

Concur will continue to evolve its security policies and practices to meet changing technology conditions to ensure client data is protected, while meeting our primary objective of delivering the most reliable and secure application with optimal product performance.