



Millennium Software Developers, Inc.

3601 Cardinal Point Drive Jacksonville, Florida 32257-9242

904 256-0053 800 393-4460 ClosersChoice.com

Best Practices Policy

Client Service Center

Our Client Service Center is monitored and recorded by a wired closed circuit audio and video surveillance system, 24 hours per day 7 days per week.

All client as well as personnel files are stored and locked to protect Non-public Personal Information.

After hours admittance is strictly limited and requires dual authentication including biometric technology. Furthermore, senior management is notified immediately when a staff member enters our facility outside Millennium's normal hours of operation.

Disaster Recovery

Millennium selected Jacksonville Florida for its Client Service Center for its strategic location for commerce as well as its unique geographical location with respect to the very rare occurrence of hurricanes. Jacksonville's last hurricane was Hurricane Dora in September of 1964.

Millennium's Client Service Center is equipped to handle power outages with on-site generators which are tested on a regular basis. Our operation systems are cloud based and can be easily utilized from any location.

Millennium's Hosted Infrastructure

For Closers' Choice is built for high security standards and is audited for adherence to PCI-DSS standards for back-end security and management processes.

On the front-end, Millennium adheres to the PCI-DSS standards for security management by implementing such security measures and controls as: real time-monitored intrusion detection and prevention, web application firewalling, file integrity monitoring on critical servers, log audit and consolidation with offsite archival storage, 2-factor authentication or administrators using industry-standard RSA token technology, and periodic vulnerability scans and penetration tests. These measures allow Millennium to ensure clients that their data is being protected at or above the standards set by the U.S. credit card industry.

Millennium Software hosted client data is in a Fully SSAE16 Compliant Facility and is protected by a Firewall and is not susceptible to injection, overflow, tampering or other corrupt input attacks.

Millennium Software provides data protection products utilizing Commvault backup systems. Incremental backups occur nightly, 6 days per week, along with full backups weekly.

Millennium employs system redundancy for infrastructure level components in power, cooling, network connectivity and the devices in between, RAID data sets and computer resources for its servers.

Millennium's Staff

All Millennium personnel have their background thoroughly checked prior to being hired. Each member is required to subscribe and follow Millennium's Code of Ethics. This is reviewed with each member of our staff on an annual basis.

In addition Millennium obtains further security clearance utilizing The Florida Department of Law Enforcement (FDLE) as well as The Federal Bureau of Investigation (FBI).



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Code of Ethics

Millennium Software Developers, Inc., developers of *Closers' Choice* software:

1. Requires the highest standards for honesty, integrity and ethical conduct at all times, including proper and ethical procedures for dealing with actual or apparent conflicts of interest between personal and professional relationships.
2. Requires all directors, officers, and personnel of the Company to act in good faith, with due care, competence and diligence, responsibly, without misrepresenting any material fact, and without allowing his or her independent judgment to be compromised or subordinated.
3. Prohibits engagement in conduct or activity, whether or not specifically prohibited in other Company policies, which may raise questions as to the Company's honesty, impartiality or reputation.
4. Requires compliance with the provisions of policies and guidelines set forth in this and/or any other code of business conduct or ethics code adopted by the Company.
5. Requires full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the Company with governmental and regulatory agencies.
6. Requires full, fair, accurate, timely and understandable disclosure of all material information known to them regarding the current or future financial condition, financial performance, or the business of the Company as appropriate.
7. Requires compliance with all applicable laws, rules and regulations as well as any other business policy adopted by the Company.
8. Requires reporting of any potential or apparent violations of the Company's business policies or illegal behavior to their supervisor, the Human Resources Department, the Board of Directors or a designated Committee thereof.
9. Requires the highest level of confidentiality and fair dealing both inside and outside the Company's business environment and forbids the use of such confidential information for personal advantage.

On an annual basis, all individuals subject to this Code of Ethics will be presented with this policy and will be asked to read and abide by these guidelines and acknowledge receipt of the most recent "**Code of Ethics.**"